

DOCKETED

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SF Environment comments on CEC EBD program guidelines

Additional submitted attachment is included below.



June 30, 2023

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 22-DECARB-03
1516 Ninth Street
Sacramento, CA 95814-5512

RE: Docket No. 22-DECARB-03; Comments on the California Energy Commission Equitable Building Decarbonization Program Draft Guidelines Request for Input

Dear California Energy Commission Staff,

On behalf of the City and County of San Francisco, I am writing to express support for the Equitable Building Decarbonization (EBD) Program Draft Guidelines. The EBD program will be an important demonstration of how to conduct direct install programs across the state and has the potential to greatly accelerate decarbonization.

San Francisco is on the leading edge of equitable building decarbonization, which can be seen in the commitments we have made in our 2021 Climate Action Plan, in which every action has an associated equity metric.¹ Our goals for the building sector include zero emission new construction by 2021 – which we accomplished with our All-Electric New Construction Ordinance,² all large commercial buildings are zero emissions by 2035, and all buildings are zero emissions by 2040. Programmatic support is a key component to ensuring that we decarbonize our buildings rapidly and equitably and San Francisco looks forward to partnering with the California Energy Commission (CEC) on this program and others.

We submit the following comments for your consideration:

1. While we appreciate the guideline's focus on disadvantaged communities and tribes, there is no explicit racial equity framework or goals in the guidelines. We recommend that the guidelines explicitly include racial diversity in the definition of "diversity" in Chapter 2. Section D. We also suggest that the guidelines include racial equity metrics for program participation for both residents and workers in order to support the "Advance energy equity" goal. Climate solutions that fail to address racial inequity are less likely to be successful.

¹ <https://sfenvironment.org/climateplan>

² <https://sf.gov/all-electric-new-construction-ordinance>

2. We recommend that the CEC change the remediation cost cap in one or more of the following ways in order to provide additional support to residents and not discourage the enrollment of homes that have significant remediation needs.
 - a. Remove the overall cost caps for remediation and instead explicitly determine which remediation measures are within the scope of the program and provide cost caps for individual measures. The guidelines already provide examples of remediation measures in Table 4.
 - b. Separate wiring and electric service upgrades from other remediation measures or identify existing or new funding and financing sources that can help to cover the out-of-pocket costs of these measures. Wiring and electrical upgrades are directly necessary for the installation of high efficiency, electric appliances, while other remediation measures may not be directly required for electrification. The San Joaquin Valley (SJV) Affordable Energy Pilot also had a \$5000 remediation cap, but electrical upgrades were fully covered and did not count towards the cap.³ The High-Efficiency Electric Home Rebate program provides rebates for electrical upgrade measures.⁴

Program administrators could provide a remediation fund for weatherization assistance programs that are already providing remediation services in addition to weatherization if they do not want to handle the remediation aspect of the installation project. Providing additional support for home remediation and improving comfort, health, and safety are sure to lead to more positive responses from participants and higher participation rates, both important metrics for program success.

3. We suggest that the CEC explicitly include coordination with programs and agencies that provide funding for home remediation in Chapter 4 Section A. Examples of such agencies and programs are the California Department of Housing and Community Development and community development block grant contacts throughout the state.⁵ Including these agencies and programs in the guidelines will encourage potential program administrators to proactively reach out to them and include them in their project proposals. Partnering with these agencies provides an opportunity for the EBD program to reduce expenditures on home remediation while not leaving out homes where significant remediation is necessary. Local governments should be encouraged to proactively connect program administrators to local funding resources that may exist, such as for low-income housing rehabilitation or hazard abatement, local matching funds, bond financing pools, or other resources that could augment program resources and enhance impacts.
4. We recommend that the guidelines explicitly encourage low wattage options for electric appliances. Low wattage appliances and energy management systems are important strategies for minimizing the increase in peak electrical load as well as minimizing the need for panel upgrades, which can be both costly and time-consuming. By “low wattage” we refer to devices where peak operational wattage draw is lesser than comparable appliances. While low wattage devices are efficient, peak rated wattage is an independent metric, and explicitly rewarding the adoption of these strategies will allow the program to demonstrate to residents and workers how to decarbonize buildings quickly and efficiently by working within existing panel/electric service capacity. In aggregate, low-wattage appliance selection reduces

³ <https://gridworks.org/2021/09/lessons-learned-so-far-in-targeted-building-electrification/>

⁴ <https://www.rewiringamerica.org/policy/high-efficiency-electric-home-rebate-act>

⁵ <https://www.hud.gov/states/california/community/cdbg>

upstream infrastructure costs such as utility transformer upsizing, and maximizing utilization of existing capacity applies downward pressure on utility rates.

We believe that explicitly including racial equity metrics in the program guidelines, further prioritizing building remediation, and explicitly encouraging low wattage appliances in the EBD program guidelines will improve the outcomes of the program. We thank the CEC for the opportunity to comment on the draft guidelines.

Sincerely,

A handwritten signature in black ink, appearing to read 'Cyndy Comerford', with a long horizontal flourish extending to the right.

Cyndy Comerford
Climate Program Manager
San Francisco Environment Department
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