

**DOCKETED**

<b>Docket Number:</b>	22-DECARB-03
<b>Project Title:</b>	Equitable Building Decarbonization Program
<b>TN #:</b>	252325
<b>Document Title:</b>	Disadvantaged Communities Advisory Group (DACAG) Comment on Draft Equitable Building Decarb Direct Install Program Guidelines
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Disadvantaged Communities Advisory Group
<b>Submitter Role:</b>	Public Agency
<b>Submission Date:</b>	9/20/2023 1:20:29 PM
<b>Docketed Date:</b>	9/20/2023

*Comment Received From: Disadvantaged Communities Advisory Group  
Submitted On: 9/20/2023  
Docket Number: 22-DECARB-03*

**Disadvantaged Communities Advisory Group (DACAG) Comment  
on Draft Equitable Building Decarb Direct Install Program  
Guidelines**

*Additional submitted attachment is included below.*

September 12, 2023

Chair Hochschild and Members of the Commission  
California Energy Commission (CEC)  
715 P Street  
Sacramento, CA 95814

CC: California Public Utilities Commission (CPUC)  
Energy Division  
505 Van Ness Avenue  
San Francisco, CA 94102

**Re: Equitable Building Decarbonization Direct Install Draft Program Guidelines**

Dear Chair Hochschild and Members of the Commission:

On behalf of the Disadvantaged Communities Advisory Group, we file comments on the Equitable Building Decarbonization Direct Install Draft Program Guidelines. We strongly agree with the Draft Guidelines' statement that "[b]uilding decarbonization must prioritize low-income, disadvantaged, and tribal communities, who bear the highest energy burden and have suffered the most from historical environmental injustices, economic disparities, and the current climate crisis."<sup>1</sup> We appreciate the staff of the Energy Commission recognizing this important concept and devising this program accordingly.

The DACAG is an 11- member group that was formed by Senate Bill 350, the Clean Energy and Pollution Reduction Act of 2015. The DACAG's role is to review CEC and CPUC clean energy programs and policies to determine whether those programs will be effective and useful in disadvantaged communities, including tribal and rural communities. Group members are either from or represent disadvantaged communities.

The DACAG strongly supports accelerated building decarbonization, including a focus on advancing decarbonization efforts in overburdened communities. We recognize the scope of this work is significant as methane interests have perpetuated a robust and unhealthy system that makes burning methane in homes an all-too-common occurrence in California. Still, California has allocated significant resources that can go towards improving our buildings. The following sections provide some more specific input on program implementation.

*Initial Community Focus Area*

We appreciate the thoughtful approach of the Draft Guidelines identifying communities for initial focus. The criteria appear well thought out. There is one area for improvement, which is incorporating communities harmed by air pollution. The current draft language wisely includes the following criteria for initial community area focus: "Communities vulnerable to extreme heat, high fire risk, or other climate risks." In addition to vulnerabilities to climate change, we encourage inclusion of

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<sup>1</sup> Draft Guidelines, at pg. 1, available at <https://www.energy.ca.gov/publications/2023/equitable-building-decarbonization-direct-install-program-draft-guidelines>.

areas experiencing high levels of ambient pollution levels. Thus, we recommend this criteria add the language in red below:

*Communities vulnerable to extreme heat, high fire risk, **substandard housing (which may include older mobile homes) and/or other climate risks, in addition to communities vulnerable to high levels of ambient pollution concentrations.***

By incorporating air pollution impacts, the program will more fully provide safer indoor spaces for communities that suffer from myriad days of unhealthy air outside.

*Ensuring Contractors to Serve Overburdened Communities in Rural and Tribal Areas*

As the Commission embarks on this program, we encourage continued monitoring of contractors to implement these programs. Particularly in rural and Tribal areas, building electrification and decarbonization is not yet supported by the contractor ecosystem. The Commission should do more to improve understanding of the deployment gaps (e.g., skills, product knowledge, access to incentives) that are barriers to contractors and end users conducting building decarbonization projects. This will be critical as it seeks to implement the Tribal specific programs, in addition to reaching rural communities through this program.

*Strong Support for Tenant Protections*

We appreciate the recognition of the program that there needs to be tenant information in predominant languages spoken in the community. In addition, mandatory tenant protections should include provisions to avoid temporary displacement, evictions, and rent increases. Given that the conduct of landlords can be hard to track, we encourage the Commission to allocate some resources to assess how effective these measures are at ensuring the laudable goals of tenant protection are met.

*Strong Support for the Set Aside for Manufactured and Mobile Homes*

We recognize the need to protect communities from indoor air pollution related to aged manufactured and mobile homes. We also support increased investments in this area above the set current set aside.

*Strong Support for High Road Workforce Standards*

We support the inclusion of high road workforce standards that provide equitable access to quality jobs for workers providing services under this program. We request a report back from program administrators on how workforce standards are being implemented within a year of the first installation under the program.

We appreciate your consideration of these comments, and we look forward to the work on equitable decarbonization.

Sincerely,

The California Senate Bill 350 Disadvantaged Communities Advisory Group (DACAG)