

DOCKETED

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PRIORITIZE RENTERS FOR FAIRNESS AND EFFECTIVE CLIMATE ACTION

Additional submitted attachment is included below.

PRIORITIZE RENTERS FOR FAIRNESS AND EFFECTIVE CLIMATE ACTION

Long Beach 350

Environmental Justice Committee of the AAPI Equity Alliance

Long Beach Gray Panthers

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PRIORITIZE RENTERS

1. The goal of the program is to address global warming by the rapid deployment and use of rebates to reduce natural gas usage in as many residences as possible. Renters are the great majority of low- and moderate-income households, therefore maximum access by renters must be a primary focus of the program. The program has unnecessary barriers to participation by renter. This comment proposes several ways to remove obstacles.
2. Renters should be able to directly obtain and use rebates for themselves, especially because dependence on building owners often creates barriers. DOE guidelines (4.1.3) allow rebates to be directly requested by the renter. But California's program does not seem to give renters that right; at present only the owners of multifamily housing are able to obtain and use the rebates, even though a building's eligibility is based on tenants' incomes. This dependence on building owners can create barriers, e.g.: when an income-qualified tenant cannot get rebates because the building is not eligible for rebates because fewer than half of the households are LMI, or when a building is eligible but the landlord does not seek rebates. In such cases, tenants can only get rebates if they are able to act independently.
3. Cooperation of building owners with the rebate program and with renters should be encouraged by education, and when necessary, required by state & local ordinances and enforcement. If tenants are carrying out rebate projects on their own, building owners should provide the required written permission. Some appliances could be required for health reasons: heat pumps provide healthy temperatures and electric appliances replace gas appliances that cause indoor air pollution.
4. Portable appliances, products and materials should be covered by rebates because renters are able to independently use portables. There are many portable models of appliances (now awaiting Energy Star ratings to qualify for rebates). There are also products for insulation, air sealing & ventilation such as insulated window shades and heat reflective window films, draft seals and door sweeps. These can be installed and operated without building modifications (or with only minor modifications), thus renters can independently take actions.

5. Induction-compatible cookware should be covered by rebates. Such cookware is necessary to use induction cooktops, but may be too expensive for low-income households.

6. Allow rebates to be used to acquire more than one appliance of a single type if needed. Current regulations forbid households from getting more than one appliance of a single type. However, there are many legitimate reasons to need multiple appliances: replacement of broken or stolen appliances; multiple portable cooktops needed for restricted spaces; households at a single address with multiple buildings need multiple heat pumps; portable heat pumps are needed to service several rooms.

7. The costs of work and materials needed to use portable appliances (in addition to basic installation) should be covered by rebates. Examples include: good quality venting/ductwork connections to windows for portable heat pumps; ducting security for ground-floor and other accessible windows (window bars), or security screened exterior doors modified for ductwork; and electrical safety and upgraded wiring for electric appliances.

Re 8 & 9. What happens when renters move? Can they take appliances with them? Or, are they eligible for rebates at the next residence? Some combination of these two options would be fair to renters and advance the goals of the program.

8. Renters should be eligible for rebates when they change their residence. They should be eligible for rebates at each new residence. The regulations do not say if households whose residences received rebates are eligible for rebates at subsequent residences.

9. An individual who was a member of a household that received rebates should be eligible for rebates when they move out to another residence. Energy Commission documents do not state whether individuals have this right.

10. Renters should be allowed to take portable appliances. Current regulations require appliances to stay with the dwelling, and renters cannot take the appliances when they move out. The appliances are the property of the building owner, even though rebates were acquired due to the renter household's income qualification. Although tenants do benefit from improved living conditions, the economic benefits go to everyone else: landlords, contractors, retailers and manufacturers.

11. "Households" should be generously and broadly defined to maximize eligibility and program participation. "Households" (not individuals) are eligible for rebates. Eligibility should "Address all types of households" (DOE guidelines), but the Energy Commission has not made public how it will implement this directive. There are many household configurations, and household membership may change and may be ambiguous or complex. The definition should facilitate wide eligibility and deployment of rebates.

12. All residential building types should be eligible for rebates: multi-family regardless of number of units and single family (including duplexes), manufactured housing, and rebates should apply to all appliances and building materials and installation. Phase 1 made only some housing types eligible for rebates (multi-family with 5 or more units and single family), and single-family housing was eligible only for heat pumps. No explanation was given for the choice of restrictions. Insulation was not included in Phase 1.

13. Nonprofit-owned affordable housing should be prioritized for receiving rebates, because they intend to keep the housing permanently affordable to LMI tenants. For-profit multifamily buildings that receive rebates are required to rent to low-income tenants only for two years. Rebate-funded improvements are likely to increase the rental value, unintentionally contributing to loss of affordability.

14. Prevent "green gentrification" in Disadvantaged Communities (DACs) by prioritizing rebates to nonprofit-owned affordable housing to keep as much of the housing stock in the DAC permanently affordable to LMI tenants. A \$200 bonus encourages projects to be located in DACs, generally speaking a worthy goal. However, as with the preceding item, the rebate-funded improvements will tend to increase rent levels, with the added problem that the DAC areas have high poverty, environmental pollution and other burdens.

NONPROFIT COMMUNITY-BASED ORGANIZATIONS

15. Nonprofit community-based organizations (CBOs) should be allowed to participate in the rebate program as Eligible Entity Representatives (EERs) and to be fully and fairly compensated for their work. These organizations are the most capable of engaging LMI households with the program. EERs are responsible for bringing eligible households into the program, and are compensated for their work. In Phase 1, it appears that only TECH Clean California and affiliated contractors are authorized work as EERs. However, many CBOs are especially capable of playing a leading role in engaging eligible households because of their extensive and longstanding trust relationships with their communities. The EER role should be also opened up to the many other organizations in order to reach our state's diverse population. Large organizations working as EERs should be required to partner with, mentor, and equitably share funding with CBOs.

CLIMATE ACTION

16. Projects must completely replace natural gas use to receive EER installation incentives and allowed costs. Phase 1 of the program is structured such that a project can use up its entire total amount of rebates (\$14K), on a heat pump, electrical panel and wiring, leaving nothing to replace a gas water heater, gas clothes dryer, and gas cooktop. The conversion away from natural gas will have failed. Left undone would be insulation, air sealing and ventilation, which need to be strategically combined with heat pumps to install the most energy efficient heating and cooling system (insulation was not included in Phase 1). There is no incentive to encourage planning and installing an optimum balanced energy retrofit. Therefore, full \$14,000 in rebates and \$1250-\$1350 in EER incentives per housing unit should be paid only if all natural gas appliances (furnace, cooking appliances, water heater & clothes dryer) are replaced with electrical appliances.

17. Energy assessments/energy audits should be utilized to plan optimal combinations of heat pump systems and insulation (minimized energy use and lifetime cost). However, funding for energy assessments is not included in the IRA, a serious and wasteful oversight. State funding and an IRA amendment are needed. Energy assessments analyze the building's thermal properties (heat leaks in and out), and evaluate various combinations of heat pump systems and insulation, air sealing & ventilation improvements. (Note: The DOE requirement for "home assessment" refers to assessment of the risk that installing a heat pump may increase a household's total energy cost, depending of relative prices of electricity and natural gas).

18. The Energy Commission must make program Implementation Blueprints, including budgets, quickly and conveniently available to the public. They are public documents (see DOE guidelines). The information is needed by the public to make informed comments and recommendations.