

DOCKETED

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3C-REN Comments on HEEHRA Phase II

Additional submitted attachment is included below.



January 10, 2025

Attn: California Energy Commission

Re: Program Design of Inflation Reduction Act (IRA) Home Equipment and Appliance Rebates (HEEHRA) Phase II

Dear Commissioners and Staff,

Tri County Regional Energy Network (3C-REN) appreciates the opportunity to respond to the Program Design of Inflation Reduction Act (IRA) Home Equipment and Appliance Rebates (HEEHRA) Phase II Request for Information (RFI).

The 3C-REN is a collaboration among three California Central Coast counties (San Luis Obispo, Santa Barbara and Ventura) established to deliver energy-saving and decarbonization programs, and industry trainings that help reduce energy use, strengthen local job markets, and support efforts to achieve climate goals. 3C-REN's locally-administered energy-saving programs and services are designed to address existing gaps in current programs, and to meet the needs of local government agencies, building professionals, and residents throughout the region. 3C-REN also strives to leverage our programs as a way to re-invest in our community as a whole, support historically underserved communities, and mitigate gaps and disparities caused by social inequality. Input on the HEERHA Phase II Program is below.

1) Eligible Equipment and Appliance Rebates

3C-REN supports all DOE eligible equipment from Table 1 be available to single-family households and multifamily properties. 3C-REN's Single Family Home Energy Savings Program offers incentives on all the proposed equipment with participating contractors installing the measures successfully. Aligning with existing program offerings reduces market confusion and encourages seamless contractor participation. Below is a table detailing the type and count of equipment the program has incentivized.

3C-REN also supports the rebates amounts to remain at the proposed level. Any reductions to rebate amounts can be considered at a later date and must account for regional participation variability as well as engagement by targeting household incomes (low vs. moderate income households).

2) Regional Allocation and Customer Engagement

3C-REN encourages staff to consider additional factors in allocating funding across the State. Phase II funding. While the funding was allocated proportionately to serve underresourced communities based on relative population, there are other factors at play. For instance, regions in California with low-to-moderate income communities that are more widely dispersed require more funding to properly implement such programs.

3) Contractor Engagement and Support

Effective Methods to Recruit Participating Contractors

To effectively recruit contractors for the HEEHRA Phase II program, especially in underresourced, low-income, and rural communities, the following methods have been identified as most successful by 3C-REN's Building Performance Training which focuses on workforce education and training in the 3C-REN territory:

Utilizing Existing Networks: Leveraging established relationships with existing trade ally networks, distributor and manufacturer networks, and partnerships with industry training providers can significantly enhance recruitment efforts. Additionally, collaborating with program administrator networks, Community Choice Aggregators (CCAs), local governments, and similar entities, can help reach a broader audience.

Streamlining Enrollment Processes: Simplifying and clarifying the enrollment and participation processes makes it easier for contractors to join the program. Aligning with existing program requirements reduces confusion and encourages wider participation. Clear guidelines and straightforward procedures can reduce barriers to entry and encourage more contractors to participate.

Leveraging Relationships with Industry Organizations: Utilizing relationships with trusted and well-known industry organizations to drive interest through mass outreach in their communication channels has proven to be highly effective. This approach has reached a larger number of potential contractors efficiently.

Program Requirement Trainings for Contractors

3C-REN supports a HEEHRA Phase II program with comprehensive training and support for contractors. A strategy that includes both initial onboarding training and ongoing training and resource support has been seen as most effective in the 3C-REN Single Family Home Energy Savings Program.

Providing training and education on electrification increases capabilities of existing underresourced contractors, helps increase the number of contractors offering electrification services, and builds demand for higher-skilled workers in under-resourced communities. Providing training and education on electrification increases capabilities of existing underresourced contractors, helps increase the number of contractors offering electrification services, and builds demand for higher-skilled workers in underresourced communities.

4) Point-of-Sale Methodologies

Small and local business owner participation in the program design can be supported by partnering with organizations that have existing ties to the local business communities. This may include a variety of community-based organizations and business networks such as Chambers of Commerce. For example, the 3C-REN Commercial Marketplace Program is partnering with the California Green Business Network, facilitating relationship building by leveraging existing trust and outreach efforts.

3C-REN appreciates the opportunity to provide input and thanks the CEC staff for considering these comments.

Sincerely,

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