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Lack of panel participation from groups working closely with or representing low-income Californians

We appreciate the effort made by the California Energy Commission (CEC) and California Public Utilities Commission (CPUC) for organizing the joint-agency workshop on Building Decarbonization. The workshop provided insights into the current policy landscape and future potential for decarbonizing buildings in California.

The California Housing Partnership urges CEC and CPUC to include organizations with the mission of representing the interests of low-income households, people of color, or disadvantaged communities in order to ensure that both the process and the final targets of these policies remain inclusive. Both the agencies should use such opportunities to encourage panel participation from groups that are most marginalized in these conversations and are most energy burdened. Even as the workshop progressed, the challenges and opportunities inherent to the low-income and disadvantaged communities and low-income households living in multifamily buildings were largely missing. California Housing Partnership is part of the Energy Efficiency for All (EEFA) coalition and works closely with groups like Asia Pacific Environmental Network, California Environmental Justice Alliance, and the Greenlining Institute. Collectively, our goal is to ensure that building decarbonization policies and programs are equitable.

Senate Bill 1477 ruled that a minimum of 30% of the amount for the Building Initiative for Low Emissions Development (BUILD) program be allocated to new low-income residential housing. The comments filed on March 11th, 2019 by the California Housing Partnership on the Scope of Rulemaking 19-01-001 highlighted the need for developing and designing a program that is tailored to meet the needs of this sector. The Clean Energy in Low-Income Multifamily Buildings (CLIMB) Action Plan published by the CEC also discusses the unique opportunities and challenges of reaching the low-income multifamily renters.

In light of this, we recommended in our March 11th, 2019 comments that the agencies include the voices of stakeholders with the mission of representing low-income households across California. Engaging with a diverse group of stakeholders can ensure that the concerns of people directly affected are addressed in the solution.

The workshop on April 8th, however, failed to provide a platform for the voices of underserved communities. Hence, we encourage the Commission to engage representatives of underserved communities early on in the process to truly develop an equitable decarbonized economy and ensure that the benefits of these technologies reach those that have been historically marginalized.