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Public comment for DACAG meeting 1/21/21 contributed by Holmes Hummel, Clean Energy Works

Additional submitted attachment is included below.

From: [Holmes Hummel](#)
To: DAC-ag@cpuc.ca.gov; [Energy - Public Advisor's Office](#)
Subject: Public comment for DACAG meeting 1/21/21 contributed by Holmes Hummel, Clean Energy Works
Date: Friday, January 21, 2022 4:31:39 PM

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Thank you for the opportunity to contribute to the DACAG meeting today during the public comment period. The comment is provided here in writing as delivered.

My name is Holmes Hummel, and I serve as Executive Director of Clean Energy Works, a public interest organization that is focused on advancing equity and inclusion in the clean energy economy.

As members of the DACAG would know, the CEC's Barriers Study - mandated by the same law that led to the formation of the DACAG itself - concluded five years ago that the upfront cost for all distributed energy solutions presents a barrier to participation in disadvantaged communities.

In response, the Barriers Study recommended that the California Public Utilities Commission consider demonstrating an inclusive financial solution called tariffed on-bill investment.

This solution has been approved in multiple states and was most recently mandated in Illinois through the Climate Equity & Jobs Act provision calling for an Equitable Energy Upgrade Program.

By that time the Barriers Study was issued, however, the CPUC had already committed to testing a subsidized loan program for homeowners. It ultimately produced results consistent with loan programs in four other states, none of which have reached more than 0.1% of the households in their eligible service areas in any year.

That is why we took note in August 2020 when the CPUC ordered a new rule-making on clean energy finance, taking a step toward the Barriers Study recommendation.

The CPUC indicated that a dozen other rule-makings could be affected, including four that are in the Priority Areas affirmed by the Disadvantaged Communities Advisory Group today:

- Affordability
- Building Decarbonization & Electrification

- Distributed Energy Resources
- Transportation Electrification

More recently, the CPUC updated the clean energy finance rule-making, adding a detailed template for proposals and a series of deadlines and decision dates over the next year.

In the near-term, each of the for-profit utilities in California must present their proposed solutions at a public workshop in March and submit written filings in April.

Also, each utility must explain how their proposal advances every single one of the 9 Goals of the CPUC's Environmental & Social Justice Action Plan - or explain in writing why they cannot.

Given these developments, we would encourage the Disadvantaged Communities Advisory Group to consider requesting a briefing on the clean energy finance rule-making at the February meeting.

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Holmes Hummel, PhD

Executive Director

