

**DOCKETED**

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## **Efficiency first**

Installing heat pumps before a building is air sealed and insulated will lead to the installation of oversized heat pumps with higher home energy costs, more use of climate polluting peaker plants, greater risk of grid overload during extreme heat events, and slower achievement of 100% clean energy than if air sealing and insulation were done first.

As a physician, I'm familiar with Medi-Cal's step therapy requirements for some conditions where prescribers must start with the least expensive older medications which are often enough to help most patients, before approving the addition of newer, more expensive drugs. HOMES and HEERHA could take a similar stepwise approach and issue rebates sequentially, first for very basic building envelope improvements like air sealing and attic insulation, and then for heat pumps. The program could start by pre-qualifying homes which have already participated in the state's Weatherization Assistance Program.

CalEnviroScreen is a pretty good tool for prioritizing where to invest but it has an inherent bias toward urban areas because it assumes that poor people live in ghettos. In rural areas like mine, rich folks, poor folks, white folks and people of color all reside in the same census tracts. This was an issue in Humboldt County during COVID when an extremely disproportionate percentage of Latino residents were infected but DHS didn't see the inequity, because the cases weren't concentrated in census tracts with a high proportion of Latinos or POC. Our largest town has a population of around 30,000, so this isn't just about tiny hamlets. If you are contemplating using CalEnviroScreen to define the population who qualify for rebates, you might consider making some kind of exception which would pull in more rural communities.