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Comments on Equitable Building Decarb Program Draft Guidelines

Chapter 2, Section D: Initial Community Focus Areas (Page 8)

On serving rural communities and achieving geographic equity: Communities like the Town of Truckee (and other regions of the Sierra Nevada) often fall through the cracks of State or utility programs because the population is not as income disadvantaged as inner-city populations, population densities are lower, and construction and contractor travel costs are higher. The Energy Savings Assistance (ESA) Program and the Weatherization Assistance Program (WAP), for example, have focused their efforts elsewhere, and as a result have achieved little program uptake in the Truckee area (only one home has been served by Southwest Gas's ESA program in Truckee, despite the presence several hundred eligible households). In addition, as Truckee is served by three utilities (two IOUs and one Public Utility), utility programs are patchwork and not as robust as those in other territories (like PG&E). Finally, Truckee and the surrounding region are typically not competitive for State or Federal grants related to decarbonization due to population size and income constraints.

Though Truckee itself is not eligible for the Equitable Building Decarbonization Direct Install Program as proposed, other areas of Nevada County and Placer County are. It is crucial that decarbonization programs serve these cold climate rural communities for several reasons: 1) There is a dearth of data on the costs and energy savings of weatherization and building decarbonization technologies in cold climates. This leaves rural mountain residents and stakeholders highly skeptical of decarbonization technology, which in turn makes it difficult for local governments to pass building decarbonization policies and leverage incentive dollars. 2) Building envelope improvements are of particular importance for health and safety in the Sierra Nevada, where they protect against cold winter temperatures and summer wildfire smoke penetration. Envelope improvements also result in greater energy savings in cold climates than in milder climates. 3) Stimulating demand for building decarbonization technology (particularly heat pumps) will help to spur contractor familiarity and expertise with such technologies.

Will this program have geographic targets to ensure that rural regions are served and geographic equity is achieved? It is cheaper and more convenient to service dense, urban areas, and a lack of formal targets or commitment to rural regions will likely cause them to go unserved. When considering the service of more rural geographies, project bundling strategies will be critical to the economic viability of the program.

J. Pricing and Cost Caps (Page 16)

The DOE WAP Weatherization Readiness Fund Plan (which was created out of need

for more substantial home remediation funds than WAP could offer), budgeted an average of \$13,000 per home for remediation issues. Will \$3,000-\$5,000 be enough to address the necessary home repairs?

Overall, this is a fantastic program.