

DOCKETED

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**City of West Hollywood Comments on CEC Equitable Building
Decarbonization Direct Install Program Draft Guidelines**

Comments attached.

Additional submitted attachment is included below.

Date: June 29, 2023

Subject: City of West Hollywood Public Comment on the Equitable Building Decarbonization Direct Install Program Draft Guidelines

To: California Energy Commission, 715 P Street, Sacramento, CA 95814

Via Electronic Submission

To the California Energy Commission:

The City of West Hollywood appreciates the opportunity to provide comments on the draft guidelines for the Equitable Building Decarbonization Direct Install Program (the “Program”). In 2021, the City adopted its Climate Action & Adaptation Plan (the “CAAP”) that outlines the City’s intended path to achieve carbon neutrality by 2035 and adapt to the impacts of a changing climate while centering equity and quality-of-life outcomes for the West Hollywood community. Emissions from energy usage in residential, commercial, and institutional buildings is the largest contributor of municipal (67%) and community-wide (58%) emissions. Under the CAAP, the City has committed to several actions related to existing building decarbonization. To achieve carbon neutrality by 2035 and the goals of the CAAP, the City will need to decarbonize its buildings – most of which are existing multifamily and renter-occupied buildings. The City respectfully submits comments on the draft guidelines as follows:

- Chapter 2, Section F - Household/Property Targeting: The City of West Hollywood is home to a higher percentage of elderly residents and residents without access to a vehicle relative to the rest of Los Angeles County. While the eligibility criteria is largely based upon income level, the City recommends considering seniors as part of the targeted outreach. Additionally, local jurisdictions that are pursuing their own building decarbonization programs could benefit from data on targeted households and properties as proposed in the draft guidelines. This sort of granular information could help local jurisdictions identify priority buildings for support and assistance as part of local retrofit and electrification programs. Will this data be made publicly available or available by request?
- Chapter 2, Section G - Outreach and Engagement: The City recommends that program administrators also inform and engage with local jurisdictions as part of the direct outreach under the program.
- Chapter 4, Section C - Tenant Protection: The City of West Hollywood supports inclusion of tenant protections as part of the Program, particularly that provision that protects tenants from any costs of decarbonization improvements being passed through as increased rent. As a city with strong tenant protections and with many residents who live in rent-stabilized properties, the City recommends that selected program

administrators be required, or at least encouraged, to collaborate with local jurisdictions on developing locally-appropriate tenant protections.

Overall, the City supports this program to advance building decarbonization, energy equity, health, and resiliency.

Respectfully,

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