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**Peninsula Clean Energy and Silicon Valley Clean Energy Post  
Workshop Comments in re Direct Install Guidelines**

*Additional submitted attachment is included below.*



June 30, 2023

California Energy Commission  
715 P St.  
Sacramento, CA 95814

**Re: Docket 22-Decarb-03 - Peninsula Clean Energy Authority and Silicon Valley Clean Energy Authority Response to Staff Workshop on the Equitable Building Decarbonization Direct Install Program: Draft Guidelines**

Dear Commissioner McAllister,

Peninsula Clean Energy Authority (PCE) and Silicon Valley Clean Energy Authority (SVCE) appreciates the opportunity to provide comments in response to the California Energy Commission's (CEC) Draft Guidelines to inform the development of the Equitable Building Decarbonization Direct Install Program.

PCE is a Community Choice Aggregation (CCA) agency and the official electricity provider for San Mateo County and for the City of Los Banos in California. Founded in 2016 with a mission to reduce greenhouse gas emissions, the agency serves a population of 810,000 by providing more than 3,600 gigawatt hours annually of electricity that is 50 percent renewable, 100 percent clean and provided at lower cost than its area's investor-owned utility, Pacific Gas and Electric. The agency has earned investment grade credit ratings from S&P, Moody's and Fitch and since inception in 2016, PCE customers have saved over \$90 million in electricity costs.

As a community-led, not-for-profit joint powers agency comprised of 22 municipal governments, PCE makes significant investments in its communities to expand access to sustainable and affordable energy solutions. This includes a planned investment of \$50 million through FY26 for building and transportation electrification, as well as distributed energy resources. In addition, PCE's building decarbonization programs include incentives for heat pump space conditioning and water heating, on-bill finance for home upgrades, pilots to support the development of emerging technologies and its low-income electrification program Home Upgrade which is further detailed below. Over 1,000 appliances have been installed through PCE's incentive programs since January 2021. Other programs include low-income customer incentives for electric bikes and used electric vehicles (EVs), EV charging for multifamily and other properties, and solar and storage for homes and municipalities.

Founded in 2016, SVCE is a CCA that serves approximately 270,000 residential and commercial electricity customers across a service area comprised of 13 Santa Clara County communities. SVCE provides electricity to 97% of electricity customers in SVCE's service area. SVCE is advancing customer programs for fuel switching to clean, carbon-free electricity to replace fossil fuels used in transportation, buildings, and infrastructure. SVCE has saved customers \$90 million on their electricity bills since 2017 and dedicated \$84 million to customer offers and services. SVCE's building decarbonization programs include incentives for residential and small- and medium-sized business customers.

PCE and SVCE's programs include a national-leading building code enhancement program (called "Reach Codes"), that provides model decarbonization building codes and technical assistance for municipal and county governments. PCE and SVCE's partnership on the Reach Codes program has led to the adoption of half of the decarbonization building codes in the state of California.

PCE and SVCE's response focuses on a few key suggestions:

- The budget for existing local programs should be increased from \$30 million to \$100 million to ensure faster delivery of decarbonization services to low-income Californians in order to meet the State's climate objectives;
- It is important that the CEC work closely with CBOs to ensure programmatic success;
- Explore the tracking of wealth information for program participants to evaluate whether equity-focused funding is being delivered to households with genuine need for financial assistance;
- Consider additional set-asides for certain projects such as those with equipment nearing the end of its useful life, projects with existing electrical constraints that can most benefit from intelligent design, and the homes of essential workers;
- Flexibility in equipment selection that will allow projects to deliver participants the right measures to suit their needs and will enable more homes to participate in the program;
- The remediation and electrical costs should be limited by separate caps and the combined cost cap increased;
- Aligning the Direct Install program's customer and equipment eligibility criteria would allow for the most streamlined customer experience and local program administrators are best positioned to serve as the local point of contact for customers in their areas; and
- The CEC should work with local jurisdictions to develop a registry of participating rental properties to ensure they comply with the renter protections proposed in the Draft Guidelines.

## **Background**

PCE recently completed an extensive analysis and planning process to advance aggressive transportation and building decarbonization within PCE's service area by 2035. This goal includes ambitious plans to ensure that, while other communities decarbonize, low-income communities are not left behind and dependent upon aging fossil fuel equipment and systems. In particular, it is essential that decarbonization not create added burdens or barriers to participation for these low-income communities and instead deliver them tangible benefits. Otherwise, the communities least able to bear costs will face the added costs of stranded assets and increasing gas bills.

With this context in mind, PCE established its Home Upgrade Program aimed at providing decarbonization and meaningful benefits to low-income residents in its service territory. The program provides a home assessment, targeted appliance fuel-switching replacement, and, importantly, home repairs to address basic needs frequently top of mind for residents such as window repair or handrails for the elderly. Working closely with community-based organizations for outreach and qualification, the program coordinates across multiple incentive programs including the Energy Savings Assistance program and spends an average of \$7,000 per home in PCE funding. The program has recently completed its first year in the field and has served over 190 homes and provided a range of electrification including heat pump water heaters, central and mini-split heat pumps, window and wall-

mounted heat pumps, and other measures. In most cases these upgrades were provided in homes whose systems were near the end of their life or were completely inoperable and residents could not afford to install new equipment. PCE is evaluating how to scale the program in the coming months.

Critically, the program includes several key features that ensure its effectiveness:

- **No Cost-share Expectation:** Electrification and maintenance upgrades are funded entirely by the program, with no expectation of investment by the household.
- **Integrating Funding Streams and Services:** Effectively leveraging multiple funding streams while reducing the complexity for homeowners is essential for delivering results. The program provides the customer with a single point of contact for coordination across multiple programs. This is especially important for underserved communities that face numerous challenges and would be very unlikely to navigate across multiple programs and administrators to implement decarbonization.
- **Design guidelines:** PCE analyzed the electrical requirement for full electrification of single-family homes and small multi-family homes and determined that most homes can fully electrify and be EV ready with only a 100-amp service. Based on this analysis PCE developed design guidelines that offer specific guidance on how technology options such as circuit splitters can reduce the need for costly and time-consuming service upgrades.
- **Leveraging Electric and Gas Data:** Remote assessment of panel capacity can be done through electric meter data. PCE uses this data to target homes that are unlikely to need service capacity upgrades. This maximizes program cost efficiency which is critical in the early phases of electrification when costs are high and technology improvements are on the horizon. Gas data is also leveraged to inform targeting and assessment as high gas usage may indicate old or faulty equipment in need of attention. In addition, PCE can validate decarbonization benefits by monitoring reduction in gas usage.
- **Community-Based Organization Partners:** A key dimension to successful low-income programs is building trust between program administrators and participants. Many underserved community members are reluctant to engage in programs for a wide variety of reasons including language barriers, historic injustices, and other concerns. Engagement through existing trusted organizations is essential to quickly establish community trust in the program and to ensure its success. PCE, as a joint-powers authority with board members elected by each jurisdiction it serves, leverages existing relationships and has built a network of local outreach partners specifically to foster awareness and trust among hard-to-reach populations.

PCE's Home Upgrade Program has grown and PCE is planning to expand the program:

- **Added \$1.5 million to the Home Upgrade Program** to enable:
  - Electrification at an additional 100 homes;
  - 4-5 whole home electrification pilots with battery backup; and
  - 120V installation and assessment.
- **Planning a major, multi-year program expansion starting in Q1 2024 whose RFP in collaboration with SVCE is set for release soon**, which will include:

- 150 to 250 low-income, whole-home (or whole-home equivalent) direct install projects per year;
- Integration with a larger, cost-share, turnkey offering;
- Dedicated program workforce; and
- Emergency water heater replacement electrification hotline and offering direct install program for low-income and turnkey water heater replacement for non-low-income participants. This will include a gas loaner option, similar to the emergency replacement strategy piloted within the TECH Quick Start Grants under Barnett Plumbing.

Similar to PCE, SVCE recognizes that the transition to an all-electric future must be inclusive of all communities, especially low-income communities and renters who face larger barriers to adopting clean energy technologies. SVCE is currently implementing and planning for more programs to serve these hard-to-reach communities.

Launched in 2022, SVCE's FutureFit Homes program provides incentives to residents in single-family and small multi-family homes to upgrade their water heaters and heating, ventilation, and air conditioning (HVAC) systems to all-electric technologies. The program also provides incentives for enhancing the infrastructure needed to support this transition to additional electrical appliances (e.g., electrical panels, circuit wiring). To date, the FutureFit Homes program has helped residents install 400 heat pump water heaters and nearly 50 heat pump space heating and cooling systems. Approximately \$1.2 million in incentives has been reserved to support residential electrification projects in the pipeline. In June 2023, the FutureFit Homes program expanded eligibility so that more low-income customers can access higher rebates. Previously, only customers enrolled in CARE or FERA were eligible for the \$1,000 adders that were on top of SVCE standard rebates for heat pump installations, prewiring, and panel upgrades. Now, customers that are at or below 80% of AMI for Santa Clara County can also receive these adders-up to \$13,000 in rebates per household.

SVCE recognizes that electrification upgrades alone do not guarantee bill savings and utility rate design is integral to encouraging all-electric construction. In 2023, SVCE established an E-ELEC ("Electric Home") residential rate for customers that own and operate a heat pump space or water heater, an energy storage system, and/or an electric vehicle. SVCE's Electric Home rate promotes equitable decarbonization by providing a 10% generation discount and steeper time-of-use incentives to shift power use out of peak.

Finally, SVCE is planning to expand its offerings to include a multifamily direct install program for building and transportation electrification that will serve deed-restricted affordable multifamily properties. This \$12 million program is currently under design with an expected launch in 2024.

## **Responses to Questions**

PCE and SVCE provide the comments below in direct response to questions posed to stakeholders following the May 15, 2023 staff workshop to present the draft guidelines of the Equitable Building Decarbonization Direct Install Program (Program). These comments draw on PCE's experience with

its Home Upgrade Program and SVCE's experience with its low-income programs and are all aimed at informing how to maximize the impact of the Program.

**1) Do you have feedback on the proposed budget breakdown?**

PCE and SVCE recommend increasing the budget allocation to support existing programs from \$30 million to \$100 million and allow local programs such as those administered by CCAs to be eligible for this funding. It is critical to electrify as many buildings as quickly and efficiently as possible in order to meet the State's carbon neutrality goals.<sup>1</sup> And while statewide EV adoption is well-underway<sup>2</sup> and renewable generation and battery storage capacity continue to increase,<sup>3</sup> electrification of existing buildings remains nascent with less than 10% of California homes being all-electric.<sup>4</sup> Thankfully, California has also established ambitious goals to install 6 million heat pumps by 2030.<sup>5</sup> However, PCE and SVCE are concerned that the current budget allocations will not provide for the rate of funding deployment necessary to meet these ambitious targets.

Statewide electrification programs can be slow to produce results. For instance, while the TECH program was announced in September 2019, projects were not able to reserve funding until 2022. Based on this experience, PCE and SVCE are concerned about the timeline presented by staff during the May 15th workshop. It forecasts that the statewide Direct Install Program funds will not be made available until 2025 or later. We agree contracting, administration, and program ramp-up will be crucial to ensure the success of the Direct Install Program and these steps cannot be rushed. However, in order for California to meet its 2030 goals, funding should also be made available as quickly as possible and a common-sense tactic to do so is to allocate more funding to support local programs. Increasing the Existing Programs budget from \$30 million to \$100 million would allow for more of this crucial funding to be efficiently delivered in the near term while contracting, administration, and program ramp-up are completed prior to the launch of the Direct Install Program.

**2) Would you recommend any changes to the proposed regions or budget allocation?**

Yes, as discussed above in response to question 1.

**3) What specific activities do you believe will be the most important for participating CBOs to lead or engage in?**

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<sup>1</sup> *California Releases World's First Plan to Achieve Net Zero Carbon Pollution*, Office of Governor Gavin Newsom, November 12, 2022, <https://www.gov.ca.gov/2022/11/16/california-releases-worlds-first-plan-to-achieve-net-zero-carbon-pollution/>.

<sup>2</sup> Dan Zukowski, *Most US states lag California in EV adoption by at least 5 years*, Utility Dive, February 10, 2023, <https://www.utilitydive.com/news/most-us-states-lag-california-ev-adoption-5-years-electric-vehicle-charging-infrastructure/642521/>.

<sup>3</sup> *New Data Shows Growth in California's Clean Electricity Portfolio and Battery Storage Capacity*, California Energy Commission, May 25, 2023, <https://www.energy.ca.gov/news/2023-05/new-data-shows-growth-californias-clean-electricity-portfolio-and-battery>.

<sup>4</sup> Energy Information Administration, *Highlights for fuels used in U.S. homes by state 2020*, March 2023, <https://www.eia.gov/consumption/residential/data/2020/state/pdf/State%20Fuels%20Used.pdf>.

<sup>5</sup> *Governor Newsom Calls for Bold Actions to Move Faster Toward Climate Goals*, Office of Governor Gavin Newsom, July 22, 2022, <https://www.gov.ca.gov/2022/07/22/governor-newsom-calls-for-bold-actions-to-move-faster-toward-climate-goals/>.

PCE coordinates closely with local CBOs via its Local Outreach Grants program, which funds 14 local CBOs to perform outreach and assistance to disadvantaged customers and communities. PCE also works closely with CBOs on its low-income focused programs, such as E-Bikes for All, Used EV Incentives, and Home Upgrade. SVCE provided Community Engagement Grants to local CBOs through 2020. The program was then put on hold due to COVID-19 and SVCE is exploring more opportunities to re-engage local CBOs. SVCE currently works with Silicon Valley Independent Living Center for its Medical Baseline Battery Program, which provides portable battery storage to Medical Baseline customers. SVCE partnered with Evergreen Community College District on its FutureFit Fundamentals program, a building electrification workforce training program, to provide training and incentives to local contractors.

CBOs have provided invaluable support to PCE and SVCE with community outreach, program design recommendations, translation services, and these partnerships are critical to ensure that our most vulnerable citizens and communities have targeted access to our programs. Our experience has shown us that local CBOs are valuable partners as convenors and communicators and are critical to the success of programs intended to benefit low-income communities.

**4) Would you suggest any changes to the proposed criteria for identifying initial community focus areas?**

PCE and SVCE have no comment at this time but may offer comments on this matter later in the proceeding.

**4a) Following the initial phase, do you have recommendations regarding the process and criteria by which additional communities should be considered?**

PCE and SVCE have no comment at this time but may offer comments on this matter later in the proceeding.

**5) Would you suggest changes to the proposed income verification requirements?**

PCE and SVCE support the income verification levels and requirements included in the proposed Direct Install guidelines. PCE has similar income verification levels and requirements for its own low-income programs. However, we acknowledge there are inherent limitations when using income level alone to certify a participant's actual need for assistance. We therefore encourage the CEC to explore the idea of whether wealth verification is a way to more accurately assess a potential participant's need for financial assistance and to ensure that program funding is directed to those that truly need it.



**6) Would you suggest different or additional household/property targeting criteria?**

PCE and SVCE have no comment at this time but may offer comments on this matter later in the proceeding.

**7) Would you suggest changes to the proposed set-aside for manufactured and mobile homes?**

In addition to the set aside for manufactured and mobile homes, PCE and SVCE would also recommend prioritizing the following projects:

- homes with aging equipment that is nearing the end of its useful life (greater than 10 years old);
- homes with 100-amp panels and underground wiring that would benefit from a smart, power-efficient approach to whole-home electrification as further described below in response to question 8; and
- homes serving those deemed “essential workers” during the COVID pandemic, including, but not limited to: teachers, postal workers, nurses, construction workers, restaurant workers, grocery workers, and other essential workers.

**8) Would you suggest changes or additions to the lists of required, eligible, and ineligible measures?**

PCE and SVCE are supportive of the requirement that each project include a heat pump and require at least two of four end uses to be electric. In addition, PCE and SVCE recommend including a requirement for at least 10% of program participants to receive whole-home electrification with battery backup and the removal of gas equipment and meters. Focusing on whole-homes will reduce customer program touch points through the energy transition, remove methane gas meters and equipment from homes that are increasingly shown to pose health risks, eliminate potential backsliding, and ensure efficient use of administration dollars.

We recommend the Program allow flexibility to choose the program measures related to specific end uses. Flexibility will allow the Program to deliver participants the right measures to suit their needs and will enable more homes to participate in the program. Some examples of the need for flexibility include the following:

- Water heating: while implementing its direct-install program focused on electrification measures in low-income housing, PCE has found that heat pump water heaters are difficult or impossible to implement in some homes, primarily due to constraints on physical space or room layouts. In cases like these, alternative water heating measures may be necessary. Such systems include:
  - Combination space and water heating systems, such as Harvest Thermal, enable high efficiency heat pump technology without the need for indoor HPWH venting and leveraging a single outdoor condensing unit for both end uses. Additional cost savings can be achieved through peak load shifting and demand flexibility.

- Hybrid solar thermal and electric rooftop water heaters, such as Solahart, provide an integrated approach to solar thermal, reducing maintenance issues. These can include electric resistance backup heaters and providing reliable water heating, annual energy use similar to a HPWH, and the solar functionality provides significant energy savings during summer months when electricity prices are highest. Such equipment can also allow occupants to regain additional interior closet space if it is replacing an existing tank water heater.
- Resistance water heaters coupled with appropriately sized solar PV and battery storage systems can provide similar energy costs to HPWH.
- Space heating and cooling: CEC should allow the replacement of electric heating equipment (e.g., electric baseboard, furnace, or wall heaters) with heat pump space heating and cooling when such projects are performed in conjunction with eligible fuel switching at the site. Replacing aging, inefficient electric heating equipment with highly energy efficient heat pumps can still reduce GHG emissions, with the added advantage of providing cooling to communities that are increasingly vulnerable to extreme heat. In SVCE territory, about 30% of single-family homes and 60% of multifamily properties have electric heating.
- Circuit controllers: PCE's detailed analysis indicates that most single-family homes can be electrified within 100 amps, greatly minimizing the need for electric service upgrades. However, achieving this is highly dependent upon the design approach for the project. In some cases, less common methods must be used such as circuit sharing devices (e.g., NeoCharge and SimpleSwitch). The CEC should either allow circuit controllers to be considered eligible measures or increase the cost cap for electrical work in order to enable projects to include these equipment.

## 9) Would you suggest changes to the proposed cost caps?

PCE and SVCE are supportive of the “average cost cap” approach. It is the same approach PCE has taken for its Home Upgrade Program.

However, the guidelines currently propose combining remediation and electrical costs into a singular cost cap. Combining these cost categories might limit which homes can be served. PCE and SVCE recommend splitting these cost caps into separate categories for electrical and remediation based on our experience described below. We also suggest increasing each respective cost cap based upon PCE's experiences in the Home Upgrade program. When setting these costs caps, the CEC should also consider the proposed prevailing wage requirement and the expectation that costs will continue to increase through the duration of the Program.

- Remediation: PCE has spent an average of \$1,500 per home for minor home repair services. In addition, funds are spent on remediation, such as paint and drywall work associated with electrification. PCE does not break these out as a separate line item, and, as such, cannot supply an average for that cost.
- Electrical: Electrical panel upgrades can be expensive. PCE's strategy is to avoid panel upgrades whenever possible, however, in some instances panel upgrades are unavoidable, such as for safety reasons. The average price for the Home Upgrade program has been \$4,300 for non-union panel upgrades and \$5,300 for replacements installed by using union work. In some instances, when these are added to the costs of electrical wiring to each appliance,

electrical costs could climb towards \$10,000 per home. At PCE, our strategy is to avoid electric panel replacements by using smart design strategies in the most feasible homes first. Targeting the most feasible homes first is essential to grow the market and lower costs before addressing more challenging segments. If these strategies include circuit controls, those also have an associated cost.

PCE and SVCE recommend the following cost cap for our service territories.

Household Income	Average Per-Home/Unit Cost Cap for Electrical Measures	Average Per-Home/Unit Cost Cap for Remediation Measures
Low Income (< 80% AMI)	\$5,000	\$3,000
Moderate Income (80 – 120% AMI)	\$4,000	\$1,500

**10) Do you have input on the proposed approach to program coordination and incentive layering?**

It is crucial for the customer experience to be as streamlined as possible, minimizing points of contact and paperwork requirements. Aligning on the Program’s key requirements with those of different program offerings is essential to enable incentive layering. This includes similar customer eligibility criteria and acceptance of categorical eligibility, as well as consistent equipment eligibility requirements and documentation requirements for application processing. Many underserved community members work multiple jobs, have challenging home issues, language barriers, and other challenges. Furthermore, trust is difficult to establish and program complexity results in reduced participation at every point in the process.

Because of the fragmentation of customer programs across the state, including state-wide programs such as the TECH program and various regional and local programs including those administered by the regional energy networks, utilities, and community choice agencies, it is essential that the implementer that has already established customer relationships in a community serve as the point of integration.

**11) Would you suggest changes or additions to the list of goals and metrics? Do you have recommendations regarding the use of data and analysis to inform improvements to the program?**

PCE and SVCE have no comment at this time but may offer comments on this matter later in the proceeding.

**12) Would you suggest additional tenant protections? What services would tenants need to ensure that the proposed tenant protections are effective? Can you suggest specific organizations that could provide these services?**

PCE and SVCE support the CEC’s proposal to require commitments from property owners to the following: avoid temporary displacement, maintain the current monthly rent, and commit to no evictions without just-cause. We would also note that these proposed protections can be achieved using existing legal tools at the CEC’s disposal. Accordingly, the Program final guidelines should directly reference these tools, such as Assembly Bill (“AB”) 1482 (Chiu, 2019).<sup>6</sup>

AB 1482, also known as the Tenant Protection Act of 2019, provides significant protections for tenants that should be leveraged by the Program, such as “just cause” eviction requirements and limits on annual rate increases. However, housing researchers argue that additional steps must be taken to make these existing protections more effective. The Turner Center for Housing Innovation at UC Berkeley and the Tech Equity Collaborative found that, “AB 1482 is a critical tool in building statewide renter protections and ensuring that renters are protected from steep rent increases. However, without adequate transparency and data, renters, landlords, and policymakers are not fully benefiting from its promise.”<sup>7</sup> According to their analysis, 60 percent of new advertised rental listings are appreciating beyond their corresponding cap, indicating that the law is often not having its intended effect.<sup>8</sup>

The researchers suggest that one of the barriers to effective implementation is a lack of data collection on qualified rental units which would allow for better enforcement of its tenant protections.<sup>9</sup> In order to ensure that the Program effectively leverages the provisions afforded by AB 1482 to protect tenants, PCE and SVCE recommend that the CEC work directly with state and local agencies to develop a registry of participating rental properties and ensure proper data collection and compliance with existing statewide tenant protection requirements imposed by AB 1482 such as rent caps and eviction controls. These protections are essential to ensure that decarbonizing existing rental units does not come at the expense of those currently residing in the properties.

**13) Would you recommend changes or additions to the proposed workforce standards and requirements?**

PCE and SVCE have no comment at this time but may offer comments on this matter later in the proceeding.

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<sup>6</sup> Assembly Bill 1482 (2019), [https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill\\_id=201920200AB1482](https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201920200AB1482)

<sup>7</sup> Alexander Casey and Samantha Gordon, *Rising Rents, Not Enough Data: How a Lack of Transparency Threatens to Undermine California’s Rent Cap*, Turner Center for Housing Innovation at UC Berkeley & Tech Equity Collaborative, September 2022, p8, <https://turnercenter.berkeley.edu/wp-content/uploads/2022/09/AB1482-Brief-Final.pdf>.

<sup>8</sup> Ibid.

<sup>9</sup> Ibid, p7, “To the best of our knowledge, no city currently collects the data needed across all qualified rental units to properly monitor compliance with AB 1482.”

**13a) Do you have input on how “local” should be defined (for the purpose of providing a preference for local contractors)?**

PCE and SVCE have no comment at this time but may offer comments on this matter later in the proceeding.

In summary, PCE and SVCE recommend the above approaches for the CEC’s Equitable Building Decarbonization Direct Install Program to ensure rapid impact and genuine value to low-income community members. PCE and SVCE appreciate the opportunity to provide input on the Draft Guidelines and look forward to continuing to work with the CEC and stakeholders. Please let us know if we can provide any additional information.

Respectfully submitted,



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