

DOCKETED

Docket Number:	23-DECARB-01
Project Title:	Inflation Reduction Act Residential Energy Rebate Programs
TN #:	253971
Document Title:	Redwood Energy Comments - HEEHRA availability for new construction, low-income projects started before program rollout
Description:	N/A
Filer:	System
Organization:	Redwood Energy
Submitter Role:	Applicant Consultant
Submission Date:	1/18/2024 12:48:31 PM
Docketed Date:	1/18/2024

*Comment Received From: Redwood Energy
Submitted On: 1/18/2024
Docket Number: 23-DECARB-01*

HEEHRA availability for new construction, low-income projects started before program rollout

Additional submitted attachment is included below.



To whom it may concern,

Thank you for your efforts to electrify low-income housing with HEEHRA funds. Redwood Energy serves low-income (30%-60%) and very low-income (0-30% AMI) new housing developments state-wide. We help development teams select their all-electric design strategy, and since the passage of the IRA we have been able to “flip” the design of new developments from using gas appliances to building all-electric because of the promised HEEHRA incentives.

But we have seen the first-round incentives earmarked for direct installation programs. Please ensure that HEEHRA rebates will be available to low-income new-construction projects, and that projects that were started before the implementation of HEEHRA will still be eligible to receive rebates, especially those who have gone all-electric with intent of receiving the rebates.

Because central heat pump boilers do cost more than central gas boilers, the HEEHRA incentives (per apartment) were what convinced them they could afford to switch from gas boilers. The lack of HEEHRA incentives for low-income new construction housing, as expected from the IRA language, has worried some of our affordable housing clients who added the expected HEEHRA incentives into their pro forma delivered to the banks and investors. It is very important that this project, and those like it, remain eligible to access this money to fulfill the electrification goals of the IRA rebate programs.

If you have any questions we can help with, our email addresses are below, and Sean Armstrong can be reached at (707) 502-9513.

Thank you for your consideration,

Two handwritten signatures in blue ink. The first signature is "Jonathan Sander" and the second is "Sean Armstrong".

Jonathan Sander, Sean Armstrong

jonathan@redwoodenergy.net

sean@redwoodenergy.net