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3C-REN Comment Letter to HOMES RFI

Additional submitted attachment is included below.



8/24/2023

Attn: California Energy Commission
RE: HOMES RFI

Tri County Regional Energy Network (3C-REN) appreciates the opportunity to respond to the HOMES RFI. Our comments are not a reflection of support or opposition to braiding the HOMES funding to the EBD program, but rather a suggestion to dedicate a portion of these funds to existing programs. Our comments address the following question from the RFI:

Aside from ensuring that program participation is a simple process from the resident's point of view and the need to avoid cash outlays, how should the program be structured to support widespread access and uptake in households located in disadvantaged communities or with a low income? How could CEC structure HOMES's pay-for-performance option to reach low-income communities more effectively?

3C-REN's pay for performance single family home energy savings program is well situated to rapidly deploy HOMES funding to California residents that wish to decarbonize their homes in Santa Barbara, Ventura and San Luis Obispo Counties. The program has served over 350 homes; more than half of these projects include heat pump retrofits. Many of these participants have also accessed state TECH Clean CA funding to further reduce project costs.

Although 3C-REN's program is not a Direct Install program, the program design allows for a direct install like experience for low income, or hard to reach customers. 3C-REN program incentives are roughly three times higher for these customers, and when this funding is stacked with TECH funding, contractors are able to offer a zero cost install to the customer and also receive bonus payments based on the actual energy performance of the project.

Inserting HOMES funding into the 3C-REN Single Family Home Energy Saving program would allow the state to see decarbonization results quickly and to test some of the program design elements outlined in the EBD program guidelines while maintaining the federally intended purpose of the funding to be used for metered projects. For instance, incentives could be limited to households that implemented "packages" of electrification measures to test the package element of the EBD program or other programmatic priorities.

The EBD program has great potential to serve some low-income California homes, but given the timeline to select administrators, design regional programs, conduct competitive solicitations, and launch program offerings, there will be a significant delay in delivering program benefits to California residents. Rather than waiting for the EBD program to become established, there is an opportunity to achieve energy savings now using programs and mechanisms that are already in place, such as 3C-REN's Single Family Home Energy Saving program.

Sincerely,

Alejandra Tellez, Co-Director 3C-REN