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Greenlining Institute EBD Draft Solicitation Comments

Additional submitted attachment is included below.

March 26, 2024

Reliability, Renewable Energy & Decarbonization Incentives Division
California Energy Commission (CEC)
715 P Street
Sacramento, CA 95814

Dear Commissioners and CEC Staff,

Thank you for the opportunity to comment on the Draft Equitable Building Decarbonization (EBD) Direct Install Solicitation Manual.

The Greenlining Institute (“Greenlining”), works toward a future where communities of color can build wealth, live in healthy places filled with economic opportunity, and are ready to meet the challenges posed by climate change. Given that many low-income people of color live in less energy efficient homes, face higher energy burdens, and are disproportionately impacted by indoor air pollution from fossil fuel appliances, we see the EBD program as an essential step towards addressing these inequities in the California building decarbonization space. The solicitation requirements and process play a large role in the successful implementation of the EBD program and we encourage the CEC to consider our recommendations and center equity throughout every stage of the program.

Recommendations

Community-Based Organizations (CBOs) will play an essential role in ensuring the benefits of the EBD program reach California households most in need, and CBOs must be compensated for their time and expertise. CBOs are uniquely positioned to lead and support outreach for the EBD program by being an established, trusted presence in a community, able to inform the initial community focus areas, and capable of communicating and customizing program outreach materials for the communities.

The draft solicitation limits “Administrative Costs”, which includes outreach, to a maximum of 5% of available EBD Direct Install funding and a maximum of 5% of available HOMES funding. For reference, the Solar on Multifamily Affordable Housing (SOMAH) program, a California program with a high level of CBO engagement, dedicated about 9% of its total spending to CBO activities from 2018-2022.¹ Similarly, another California equity-centered program, the Community Resilience Centers (CRC) program from the Strategic Growth Council sets aside up

¹ pg. 56 [SOLAR ON MULTIFAMILY AFFORDABLE HOUSING SECOND TRIENNIAL REPORT](#) *note it was commented that the breakdown did not fully represent the CBOs activities across other MEO categories (pg.133)

to 10% of eligible costs for community engagement alone.² The CPUC's Self-Generation Incentive Program Heat Pump Water Heater program also allocated 10% of its budget to program administration.³

While we agree with the inclination to preserve as much of the EBD program's funds as possible for deploying measures, we also urge the CEC to consider the breadth of outreach needed to reach the EBD program's target low-income households in underresourced communities and ensure CBOs are appropriately compensated for their work. As such, we provide two recommendations for the CEC to consider:

1. Classify outreach tasks under "Project-Related Costs"

The EBD guidelines specify several proposed roles for CBOs including supporting households with income verification processes, administering follow-up surveys, ensuring that tenants in participating buildings are informed of their rights, and providing translation services. Some of these proposed roles for CBOs have been identified in the draft solicitation to fall under "Project-Related Costs" such as supporting households with income verification processes and administering follow-up services. Outreach was specified during the CEC's Pre-Solicitation Workshop on March 14th, 2024 to fall under "Administrative Costs" but is not explicitly written in the solicitation.

The EBD guidelines specify that "*Applicant teams will be required to include CBOs in their proposed budgets and clearly delineate the proposed roles of participating*".⁴ It is currently unclear in the solicitation which category, whether "Project-Related Costs" or "Administrative Costs", other potential CBO roles like informing tenants or providing translation services fall. **We recommend that the CEC clarify to the extent possible, which roles fall under which funding allocations and move the marketing/outreach tasks to fall under "Project-Related Costs" which are not subject to EBD Direct Install funding caps.**

OR

2. Raise available administrative funds to a maximum of 10% of EBD Direct Install funding

If the CEC keeps outreach tasks under "Administrative Costs", **we recommend that the CEC increase the "Administrative Costs" to a maximum of 10% of available EBD Direct Install funding** to ensure appropriate compensation is available for CBOs to conduct outreach in priority communities.

² pg. 21 [Strategic Growth Council Community Resilience Centers Program | CALACT](#)

³ pg.151 [DECISION ESTABLISHING HEAT PUMP WATER HEATER PROGRAM REQUIREMENTS](#)

⁴ pg. 7 [EBD Direct Install Program guidelines](#)

Incorporate equity experience in the program narrative submission and evaluation criteria

Given this solicitation is for the *Equitable* Building Decarbonization program, Greenlining strongly believes that scoring for procedural equity should be incorporated into the project criteria and evaluation. CBOs are vital, yet historically underrepresented, members of project teams that voice communities' needs; their position should hold an equal or greater weight for project implementation decisions.

Under the "Team Roles and Internal Controls" section of the Program Narrative document, **we recommend adding another criterion requesting applicants to "Describe the team's experience with communication and decisionmaking processes that ensure equitable representation among project team members". This item should also be added in the "Team Roles and Internal Controls" section of the Evaluation Criteria** and should be scored based on the CEC's Scoring Scale, with higher ratings given to project team that provide additional weight to CBO input in decisionmaking and/or governance structures

We appreciate the CEC's consideration of our recommendations and look forward to the final solicitation and implementation of the EBD program.

Best regards,

Fatima Abdul-Khabir
Senior Program Manager of Energy Equity