

**DOCKETED**

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Submitted On: 3/26/2024  
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**CSE comments on EBD Direct Install Program Pre-Solicitation  
Workshop**

*Additional submitted attachment is included below.*

March 26, 2024

California Energy Commission  
Docket Unit, MS-4  
Re: Docket No. 22-DECARB-03  
715 P Street  
Sacramento, CA 95814

**Re: Docket No. 22-DECARB-03– Comments of Center for Sustainable Energy® regarding the Equitable Building Decarbonization Direct Install Program Pre-Solicitation Workshop**

Center for Sustainable Energy® (CSE) appreciates the opportunity to comment on the Equitable Building Decarbonization Direct Install Program Pre-Solicitation Workshop (Workshop) held on March 14, 2023.

CSE is a national nonprofit that accelerates adoption of clean transportation and distributed energy through effective and equitable program design and administration. Governments, utilities, and the private sector trust CSE for its data-driven and software-enabled approach, deep domain expertise and customer-focused team. CSE’s fee-for-service business model frees it from the influence of shareholders, members, and donors and ensures its independence. Our vision is a future with sustainable, equitable, and resilient transportation, buildings, and communities.

CSE administers innovative programs for governments, utilities, and the private sector in California and across the U.S., including the California Electric Vehicle Infrastructure Project (CALeVIP) on behalf of the California Energy Commission (CEC) and the Clean Vehicle Rebate Project (CVRP) on behalf of the California Air Resources Board (CARB). CSE is also part of the Program Administrator team for the Solar on Multifamily Affordable Housing (SOMAH) Program, a statewide solar incentive program sponsored by the California Public Utilities Commission (CPUC). These three programs, particularly CVRP and SOMAH, have robust outreach and engagement components conducted by community-based organizations (CBOs).

Based on its experience as a Program Administrator, CSE focuses its feedback and recommendations on the following topics outlined in Workshop:

- I. Outreach as Part of Administrative Costs
- II. Standard and Performance Retention

**I. Outreach as Part of Administrative Costs**

As presented during the Workshop, the CEC proposes a five percent cap on administrative costs, which are to include culturally appropriate outreach and engagement (O&E) conducted by CBOs in each Community Focus Area. If this is maintained, it would significantly reduce the amount of funds available for O&E and consequently hinder the overall ability of these efforts to adequately serve potential program participants in Community Focus Areas.

CSE recommends that a separate budget category be established to support these O&E efforts. As a Program Administrator with years of experience partnering with CBOs, CSE has found that dedicated funds for O&E allow more time for in-depth conversations with CBOs and enable collaboration on messaging and delivery methods tailored to resonate with the community. This results in the development of higher quality, culturally appropriate outreach materials that will have a greater impact. Furthermore, CBOs may require additional resources, such as engaging program videos in multiple languages for digital dissemination and use in community workshops, which necessitate additional time and staff resources to develop. Dedicated funding also creates more opportunities for capacity building for CBOs. It empowers them to become experts and advocates in their communities.

For the O&E budget to be substantial enough to have a significant impact and facilitate participation from low-income households in Community Focus Areas, CSE recommends the O&E budget be set at five percent to match the cap for administrative costs. CSE has found that at least five percent for O&E from a program's overall budget has led to the successful implementation of O&E efforts in the programs it administers that have this dedicated funding.

## **II. Standard and Performance Retention**

During the workshop (and included in the State Terms and Conditions), the CEC outlined the ten percent for standard retention and five percent for performance retention. CSE respectfully asks the following clarifying questions:


- Will a regional administrator be required to cover up to 15% of the costs through the end of the agreement since the 5% retention for project (retrofit) costs will be released after 12 months?
- Are carrying costs reimbursable?

With respect to the first question, if in fact the regional administrator would be required to cover up to 15% of the costs, these carrying costs would place an additional burden on the administrator.

## **Conclusion**

CSE appreciates the opportunity to provide these comments regarding the Equitable Building Decarbonization Direct Install Program Pre-Solicitation Workshop. We look forward to continued collaboration with the CEC and interested parties to ensure the successful launch and implementation of this program.

Sincerely,



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