

DOCKETED

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TRC Comments- Draft EBD Solicitation

Additional submitted attachment is included below.

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To: California Energy Commission

From: Catherine Chappell – Vice President Advanced Energy

Re: Draft Solicitation for Equitable Building Decarbonization (EBD) Direct Install Program Docket No. 22-DECARB-03 - Draft Scope of Work & Solicitation Manual

RESPONSE TO PRE-SOLICITATION WORKSHOP, SCOPE OF WORK AND SOLICITATION MANUAL

Summary

TRC appreciates the opportunity to provide comments on the Equitable Decarbonization Workshop, Scope of Work, and Solicitation Manual. TRC actively supports California utilities and municipalities in advancing their clean energy decarbonization efforts through incentive program design and implementation, including a portfolio of residential new construction electrification programs of CEC California Electric Homs Program (CalEHP), the electric IOU statewide California Energy-Smart Homes Program, SMUD's Smart Homes Program, Roseville Electric Utility's Roseville Advanced Homes Program (RAHP), and Southern California Edison's Clean Homes Program.

Administration Funding

- As drafted, program administration funding is limited to maximum of 5% of the total program budget. Additionally, program outreach, engagement, and recruitment services are included as part of the maximum administrative funding. In TRC's experience, program administration costs, for well run and effective programs, would range from 10-35% of total funding, inclusive of outreach and engagement services.
- **Recommendation: Increase the maximum administrative budget to at least 10% of the total budget and create a separate budget category for outreach and engagement activities.**

Budget and Retention Policy

- As drafted, the solicitation manual prescribes grant funding policies, which impose a zero-profit requirement on companies, limiting the participation of companies that would otherwise be qualified to act as prime administration contractors.
- When combined with the zero-profit requirement, the standard 10% retention policy requires companies to operate at a loss, limiting participation of otherwise qualified companies.
- The performance-based retention of 5% for measure savings performance, in addition to the zero-profit and 10% retention policy, further limits participation of otherwise qualified companies.
- **Recommendation: Remove the zero-profit requirements for prime contractors, allowing for reasonable and sustainable operating budgets.**

Tracking Tool/Database:

- As stated, the CEC is open to suggestions as to whether the tracking tool development and management (which needs to be consistent statewide) should be a separate CEC contract or should be part of each of the Regional Admin grants.
- **Recommendation: To ensure consistency, CEC should develop and manage the tracking tool, with the Regional Administrators having a collaboration role with the CEC and other RAs in tool development and determining reporting metrics.**