

**DOCKETED**

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<b>Project Title:</b>	Inflation Reduction Act Residential Energy Rebate Programs
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*Comment Received From: 3C-REN  
Submitted On: 4/5/2024  
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**3C-REN Comment Letter to HOMES Workshop**

*Additional submitted attachment is included below.*



4/5/2024

Attn: California Energy Commission

RE: HOMES Workshop

Tri County Regional Energy Network (3C-REN) appreciates the opportunity to respond to the HOMES Workshop held on March 21, 2024 and commends staff for the virtual event that created meaningful conversation and transparency into the funding and agency process.

3C-REN supports CEC's plan to dedicate 40% of the Inflation Reduction Act HOMES funding to a performance-based program aligned with the HOMES measured savings pathway and 60% to the Equitable Building Decarbonization program as a mechanism to deploy various pathways for California residents to decarbonize their homes.

As stated in our previous comments, 3C-REN's pay for performance single family program is well suited to rapidly deploy HOMES funding to California residents that wish to decarbonize their homes in Santa Barbara, Ventura and San Luis Obispo Counties. Although incorporating federal funding into program administration would require some changes, 3C-REN is dedicated to modifying programming to benefit local residents and energy savings goals, with a focus on "Hard to Reach" customers. If improving services and access requires reasonable programmatic changes to align with federal guidelines, 3C-REN is open and willing to do so.

Key to ensuring that requirements are reasonable are the following suggestions:

- 1) Do not require intensive income verification processes; use participation in discounted utility programs (CARE/FERA) as a proxy for income.
- 2) Allow customers to participate that do not have sufficient baseline energy usage history (either from being in a home for a short period of time or for recently implementing other energy changes including solar and storage).
- 3) Allow for various pay for performance program funding to "stack" within a given project so that the federal requirement that funds are not paid until energy savings have been measured do not prevent local programs from providing upfront discounts to homeowners, via immediate payment to contractors. Although aggregators may step in to advance payments to contractors and homeowners in a program that requires savings to be measured prior to payment, 3C-REN expects that project pricing will be unnecessarily higher in that scenario, given additional risk and financing costs to aggregators.



**TRI-COUNTY REGIONAL ENERGY NETWORK**  
SAN LUIS OBISPO • SANTA BARBARA • VENTURA

3C-REN welcomes questions and further discussion on this topic.

Sincerely,

A handwritten signature in cursive script that reads "Ashley Watkins". The signature is written in a dark ink on a light-colored background.

Ashley Watkins, Co-Director 3C-REN