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Comments of RCEA on HEEHRA Phase 1 CBP

Additional submitted attachment is included below.



COMMENTS OF REDWOOD COAST ENERGY AUTHORITY ON THE HIGH-EFFICIENCY ELECTRIC HOME REBATE ACT PHASE 1 COMMUNITY BENEFITS PLAN

Introduction

The Redwood Coast Energy Authority (RCEA) appreciates the opportunity to provide comments on the California Energy Commission's (CEC) Community Benefits Plan (CBP) for HEEHRA Phase I. RCEA is a local government Joint Powers Agency whose members include the Blue Lake Rancheria, the Yurok Tribe, the County of Humboldt, the cities of Arcata, Blue Lake, Eureka, Ferndale, Fortuna, Rio Dell, Trinidad and the Humboldt Bay Municipal Water District. The purpose of RCEA is to develop and implement sustainable energy initiatives that reduce energy demand, increase energy efficiency, and advance the use of clean, efficient and renewable resources available in the region for the benefit of the Member agencies and their constituents. RCEA is also a Community Choice Aggregator (CCA), Local Government Partnership (LGP) with Pacific Gas and Electric Company (PG&E) and anticipates becoming a member and lead administrator of a Regional Energy Network (REN) representing many of the rural counties in Northern California.

Background

RCEA strongly encourages electrification and has supported the adoption of heat pump technologies for HVAC, water heaters, dryers as well as induction cooking through both locally and CPUC ratepayer funded rebate and direct install programs. RCEA has long dedicated resources and pursued funding to bring these opportunities to our hard to reach and rural communities. We feel fortunate to bring some of the state and federal funding to our region, however, must point out that many of the communities in the far northern part of the state are often neglected by statewide initiatives due to the geographic isolation from metropolitan areas, smaller workforce, and lack of SB350 defined Disadvantaged Communities (DACs). Rural counties in California are targeted to host renewable energy projects meant to serve metropolitan customers while simultaneously are underserved by energy efficiency programs and experience higher energy cost to income ratios.

The CBP for HEEHRA Phase I frequently mentions prioritizing low-income hard to reach rural households and contractors, however, does not describe any specific activities to support this. More general statements are used such as working with "other CBOs serving DACs, rural and hard to reach customers" and TECH will "conduct outreach in DAC regions and rural communities." In contrast, many Central and Southern California organizations are named as part of planned engagement for education and outreach to customers and contractors. The engagement section for Low Income Communities states that "The Switch Is On ambassadors participate in and organize community events with partners in the Bay Area and Southern California." In Figure 1 of the CBP a map of TECH funded HVAC and Plumbing Education facilities shows no facilities in the north of the state. This may be interpreted as a lack of a concrete plan for reaching the rural communities of Northern California.

Recommendations

1. Include a plan for reaching contractors in Northern California

RCEA respectfully requests that the CEC include a more robust plan for reaching the low-income, hard to reach, and rural communities of Northern California. This may include establishing a training facility accessible to contractors in the northern counties. The rural, hard to reach areas in the north already lack access to contractors with training in the basics of energy efficiency and electrification due to the greater distance from any population centers with more contractors and training centers. Accessible training in our region could help transform the workforce.

2. Engage with more stakeholders in low-income, hard to reach, and rural communities of Northern California

Northern California currently does not have many CCAs and currently does not have a REN. This can make finding the right stakeholders in the region difficult, but RCEA encourages the CEC to put in the work to find those organizations to ensure this funding reaches all parts of California. Organizations, such as the Sierra Business Council, engage in energy efficiency programming with many of the counties in the far northern Sierra and Cascades.

3. Include the benefits of helping Northern California homes that burn costly fossil fuels and lack air conditioning

The Northern California rural regions also have more homes that are not heated with utility provided natural gas. Those fuels have a higher cost than natural gas and this leads to a higher energy burden for those customers. Northern California includes the climate zones that have the highest number of heating degree days. The CBP addresses the need to respond to the extreme heat crisis but does not emphasize the economic, health, and safety benefits of reducing the burning of fossil fuels in the home for heating. Switching from non-utility provided fuels to electric heat will have a great impact to customers in the north. Northern California customers have historically had low air conditioning adoption, however with increased extreme heat, as well as wildfire smoke coincident with the heat events, the need for air conditioning has grown.

Conclusion

RCEA would like to thank the CEC for considering our comments and hopes that the CEC will recognize California's rural and hard to reach northern customers and contractors in the HEEHRA Community Benefits Plan.

Sincerely,

Patricia Terry

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Redwood Coast Energy Authority