

DOCKETED

Docket Number:	23-DECARB-01
Project Title:	Inflation Reduction Act Residential Energy Rebate Programs
TN #:	258265
Document Title:	Dean Toji Comments - MAKE THE IMPLEMENTATION BLUEPRINT AVAILABLE TO THE PUBLIC
Description:	N/A
Filer:	System
Organization:	Dean Toji
Submitter Role:	Public
Submission Date:	8/1/2024 1:30:14 PM
Docketed Date:	8/1/2024

Comment Received From: Dean Toji

Submitted On: 8/1/2024

Docket Number: 23-DECARB-01

MAKE THE IMPLEMENTATION BLUEPRINT AVAILABLE TO THE PUBLIC

The CEC's HEEHRA Implementation Blueprint describes how California will carry out the rebate program. The public must have access to it in order to make well-informed comments about the program. The CEC must definitely release the Blueprint before the Phase II workshop planned for August.

Before California's rebate program can be launched, its State Implementation Blueprint must be approved by the Department of Energy. The Blueprint describes how the state will meet the programmatic requirements specified by the DOE. It must include all of the important elements of the implementation plan.

The Blueprint is a public document that unquestionably should be released. The DOE guidelines state (direct quotes are in brackets): [As a reminder, application documents, forms, and data submitted may be made available to the public at DOE's discretion following all applicable laws and regulations that protect confidential or proprietary information.] (Section 6.1. Overview.)

I asked the DOE for confirmation, and it replied: [Yes, the HEAR application is a public document, and you can reach out to CEC for a copy.]

Please note that any redactions in the Blueprint are at the discretion of the DOE, not CEC, and only for the narrowly specified reasons.)

The main body of the Blueprint was presumably submitted with the funding application and thus should be available for public release. The HEEHRA Phase I timeline provided at the workshop indicates that the Community Benefits, Consumer Protection, Education and Outreach, Data Privacy and Security Blueprint Plans would be submitted on July 31, so they should now also be available for public release.

The discussion of the Community Benefits plan has been hampered by the absence of information about the overall implementation plan, without it, the necessary context for understanding the plan was missing. For example, although there was quite a bit of general information about outreach and marketing, there wasn't a description of how a household would actually obtain rebates. There was also no explanation of why the program was being launched in two phases. The Blueprint should be released before the Phase II workshop that was announced to be held in August.

The CEC needs informed comments and suggestions from the public, and therefore should release the Implementation Blueprint as soon as possible.

Dean Toji