



Association of California Community and Energy Services

Mission Statement

To Promote a Statewide agenda to assist low-income families by strengthening our member organizations that provide services to their communities.

Member Organizations

Amador Tuolumne CAA

Amador, Calaveras, Tuolumne Counties

Campesinos Unidos, Inc.

San Diego and Imperial Counties

Central Coast Energy Services

Monterey, San Benito and Santa Cruz Counties

Central Valley Opportunity Center

Stanislaus County

Community Action Commission of Santa

Barbara County

Santa Barbara County

Community Action Marin

Marin County

Community Action of Kern County

Kern County

Community Action Partnership of Orange

County

Orange County

Community Action Partnership of San

Bernardino County

San Bernardino County

Community Resource Project, Inc.

Sacramento, Sutter, Yuba, San Mateo Counties

Community Services and Employment

Training

Tulare County

Economic Opportunity Council of San

Francisco

San Francisco County

Fresno Economic Opportunity Commission

Fresno County

Great Northern Corporation

Siskiyou County

Inyo Mono for Community Action, Inc.

(IMACA)

Inyo and Mono Counties

Kings Community Action Organization, Inc.

Kings County

Maravilla Foundation

Los Angeles County

MAAC (Metropolitan Area Advisory

Committee) Project

San Diego County

North Coast Energy Services

Mendocino, Solano, Yolo, Marin, Napa, Sonoma and Lake Counties

Pacific Asian Consortium in Employment

Los Angeles County

Project Go

Placer County

Redwood Community Action Agency

Humboldt, Del Norte, Modoc Counties

Self Help Home Improvement, Inc.

Shasta and Tehama Counties

Spectrum Community Services, Inc.

Alameda County

TELACU (The East Los Angeles Community

Union)

Los Angeles County

September 13, 2018

RE: Draft Cap-and-Trade Auction Proceeds Third Investment Plan

As a statewide organization we provide support to the 43 low-income weatherization providers who administer the Federal Department of Energy Weatherization funds and the Federal Health and Human Services Home Energy Assistance Funds. Many of our providers also administered phase 1 funding of the Low-Income Weatherization Program through the Department of Community Services and Development.

We support the Investment Plan Recommendations outlined in the draft on page 11 of the report. We support the recommendation to Prioritize Community Transformation. We support the recommendation to Develop multi-year funding commitments. We support the recommendation to Consider and plan for large investments in the long-term. We support the recommendation to Support the existing suite of California Climate Investments programs.

We would also suggest when looking at equity vs equality you take into the account the housing stock when trying to deliver energy efficient cost saving measures for low-income households.

Homes with high energy burdens that need repair outside the scope of the program must be deferred due to the lack of funding to make the home repairs to properly insulate homes and to properly fix and or update the homes mechanical systems.

How can we save energy on the demand side if we are unable to fully assist the low-income community?

The Equality vs Equity model as displayed on page 12 shows just how the current energy efficiency programs are inequitable due to lack of funding. The energy assistance programs have equality as the most vulnerable and impacted populations can apply to receive help but the equity of receiving help is not present. Not every household is equitable as some need more repair work than others to receive services and the house that need repair are deferred and receive no to little services.

We recommend funding such repairs to leverage existing and future energy efficiency dollars creating equity in the programs. We appreciate the California Air Resources Board ongoing efforts and appreciate the opportunity to comment.

Sincerely,

Melissa Smith

Director of Environmental Programs