

March 27, 2024

Environmental Protection Agency (EPA)  
Office of Air and Radiation  
Climate Pollution Reduction Grant  
Washington, DC 20460

**Re: U.S. Environmental Protection Agency - Climate Pollution Reduction Grants Program:  
Implementation Grant Letter of Support - EPA-R-OAR-CPRGI-23-07 for the Bay Area Clean Homes  
Initiative**

Dear US EPA Office of Air and Radiation,

I am a representative of Ava Community Energy, a Community Choice Aggregator serving residents and businesses in Alameda County and parts of San Joaquin County. We commend the EPA for its creation of the Climate Pollution Reduction Grant, which will drive transformative work and significant near term GHG emission reductions through 2030 as well as provide a pathway to scale greenhouse gas reductions in priority low-income disadvantaged communities over the long term.

Ava supports ABAG's proposed Bay Area Clean Homes Initiative (BACHI) that would directly benefit low-income and disadvantaged community (LIDAC) households, as defined by EPA's Climate and Economic Justice Screening Tool (CEJST), across the region. **BACHI will deliver immediate Greenhouse Gas (GHG) reductions while building a foundation for ongoing reductions through a replicable model that combines shovel-ready home retrofits with strategic interventions to unlock the region's ability to scale residential decarbonization. BACHI's strategic partnerships and synergy of both short- and long-term strategies enables on-the-ground project implementation to directly inform effective and transformational systemic interventions that address technical, economic and behavioral barriers in frontline communities.**

Ava works closely with both the Association of Bay Area Governments (ABAG), and the Bay Area Regional Energy Network (BayREN), a partnership that serves the nine San Francisco Bay Area counties. BACHI seeks to deliver services complementary to those offered by all Bay Area CCAs and through BayREN's multifamily and single-family programs; we believe all of these efforts are vital and necessary to help rapidly decrease GHG emissions and support community decarbonization as a solution to rid our reliance on fossil fuels.

**Ava supports the design and intent of the proposed Initiative and, should the proposal be successful, will actively participate in the successful implementation of the BACHI by working with ABAG, BayREN and BAAQMD to identify and implement solutions that ensure electrification of residential homes does not result in increased utility bills. Ava staff will participate in quarterly convenings to discuss and design rate protection mechanisms for residents of LIDAC communities served by the BACHI.**

The proposed BACHI program design aligns with Ava's equity and climate action objectives, including prioritizing underserved communities, collaborating with local partners, such as other local governments, Habitat for Humanity, Rebuilding Together, community based organizations and other Community Choice Aggregation agencies, on regional outreach, and expanding our programs with electrification measures designed to support the shift to building decarbonization in existing buildings, particularly in multifamily and single-family homes.

The BACHI will deliver a streamlined region-wide program, presenting offerings that, while unified in approach, will be tailored to each community based on local needs, local goals, and complementary local services. We feel confident that the unique BACHI delivery model will expeditiously expand access to

residential decarbonization for households disproportionately impacted by pollution, burdened by high energy costs, and historically excluded from clean energy opportunities.

Ava looks forward to participating in this historic effort to drive direct, household-level climate action, economic relief for LIDAC households, and transformative solutions that will deliver significant near-term GHG reductions while positioning the Bay Area region to decarbonize our communities successfully and equitably.

Sincerely,

A handwritten signature in black ink, appearing to read "JP Ross", written over a horizontal line.

JP Ross

Vice President of Local Development, Electrification, and Innovation