



March 8, 2024

Environmental Protection Agency (EPA)  
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 Environmental Protection Agency Team:

Peninsula Clean Energy Authority (PCE) here communicates its strong support for the proposed Bay Area Clean Homes Initiative (BACHI) by the Association of Bay Area Governments (ABAG). BACHI brings together a set of partners with deep expertise and capability to leverage programs, methods and policy to maximum impact, not just for the immediate homes upgraded, but enduring benefits for long-term decarbonization and community benefit.

#### Peninsula Clean Energy

PCE is a Community Choice Aggregation (CCA) agency and the official electricity provider for San Mateo County and for the City of Los Banos in California. Founded in 2016 with a mission to reduce greenhouse gas emissions, the agency serves a population of 810,000 by providing more than 3,600 gigawatt hours annually of electricity that is 50 percent renewable, 100 percent clean and provided at lower cost than our area's investor-owned utility, Pacific Gas and Electric. The agency has earned investment grade credit ratings from both Moody's and S&P and since inception in 2016, PCE customers have saved over \$100 million in electricity costs.

As a community-led, not-for-profit joint powers agency comprised of 22 municipal governments, PCE makes significant investments in its communities to expand access to sustainable and affordable energy solutions. This includes substantial investment in building and transportation electrification, as well as distributed energy resources. Our programs include commercial-scale solar and storage (~16 MW in-progress), incentives for residential building decarbonization (over 2,000 measures in 2023), targeted low-income/disadvantaged community home upgrades, and EV charging installation in apartments (nearly 1,000 ports installed).

#### Program Background

BACHI will directly benefit across the region up to 1,500 low-income and disadvantaged community (LIDAC) households, as defined by EPA's Climate and Economic Justice Screening Tool (CEJST). 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.

PCE already works closely with both ABAG, and the Bay Area Regional Energy Network (BayREN), a partnership that serves the nine San Francisco Bay Area counties. The proposed BACHI program design aligns with PCE's equity and climate action objectives.

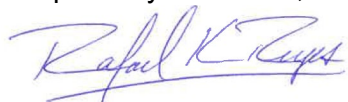
PCE currently offers complementary programs BACHI would leverage which include incentives and on-bill finance. These programs are supported by detailed building characterization and an in-depth engineering design strategy to reduce the costs of electrification. PCE's engineering design approach emphasizes avoiding service upgrades and associated costs through electrification of single-family homes within 100 amp service<sup>1 2</sup>. This effort includes region-wide meter analytics showing sufficient electrical capacity in most homes, installation guidelines, whole-home electrification demonstration pilots, and novel technology pilots<sup>3</sup>. In addition, PCE provides nationally leading no-cost technical assistance initiative to support local governments to implement advanced building codes.

PCE supports the proposed Initiative and will actively participate in the successful implementation of the BACHI by working with ABAG, BayREN and BAAQMD to:

1. Identify and implement solutions that ensure electrification of residential homes does not result in increased utility bills
2. Align on electrification best practices, including avoiding unnecessary capacity upgrades
3. Explore collaborative opportunities to secure preferential pricing on equipment
4. Ensure workforce initiatives result in development of scalable equitable job opportunities for all
5. Coordinate customer messaging on electrification benefits
6. Co-develop policy recommendations for local governments
7. Support outreach for the program

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.

Respectfully submitted,



Rafael Reyes  
Senior Director of Energy Programs  
rreyes@peninsulacleanenergy.com

---

<sup>1</sup> Yes, it's possible to electrify a home on just 100 amps, Canary Media

<https://www.canarymedia.com/articles/electrification/yes-its-possible-to-electrify-a-home-on-just-100-amps>

<sup>2</sup> Includes guidelines on electrifying homes within 100 amps: <https://www.peninsulacleanenergy.com/building-electrification-resources/>

<sup>3</sup> Space and water heating combo system pilot: <https://www.peninsulacleanenergy.com/wp-content/uploads/2024/02/PCE-Harvest-Pilot-MV-Final-Report.pdf>