



June 26, 2024

California Air Resources Board
1001 I Street #2828
Sacramento, CA 95814
By Email and Online

Re: Zero-Emission Space and Water Appliance Standards Technical Analysis Workshop

Dear Staff of the California Air Resources Board:

The undersigned organizations join the Building Energy, Equity and Power (BEEP) Coalition to provide comments on the California Air Resources Board's (CARB) initial technical analysis to develop zero-emission space and water heater standards.

The BEEP Coalition includes representatives from PODER; the Center on Race, Poverty & the Environment; the Central Valley Air Quality Coalition; Leadership Counsel for Justice & Accountability; Local Clean Energy Alliance; Physicians for Social Responsibility-Los Angeles; Central California Asthma Collaborative; Emerald Cities Collaborative - Northern California; and Strategic Actions for a Just Economy. The BEEP Coalition represents environmental and housing justice communities in various parts of the state. We formed for a simple reason: low-income communities and communities of color are being left behind in conversations about building decarbonization.

From the most recent technical analysis workshop held on May 29, BEEP provides comments to the following question: *What are the special considerations for regulating space and water heaters in rural and under-resourced areas?*

BEEP representatives from San Joaquin Valley (SJV) are intimately familiar with the challenges and opportunities of implementing an appliance upgrade program in their rural and under-resourced communities. Through the CPUC SJV Affordable Energy Pilot Program, many households were found to:

- Live in redlined areas with no access to the utility gas system and thus continue to use propane gas or wood-burning for heating and cooking.
- Be mobile home residents and thus the upgrades needed to accommodate new electric appliances were costly and challenging.
- Be monolingual Spanish speakers and farmworkers and thus culturally and linguistically appropriate outreach was critical to earning their trust and participation in the program.

In addition, a recent [community-led evaluation of the SJV Pilot Program](#) found that some

households experienced bill increases, faulty appliances, and bad-quality installation, and a number of households never received the appliances that they were promised, leading to mistrust in the program, program implementers and administrators, utilities, and CPUC. We urge CARB to read this evaluation report and its recommendations for improving the SJV Pilot Program (and other similar programs), such as establishing quality installation standards and providing funding for holistic home upgrades, including remediation and paneling costs.

The unique challenges for rural and under-resourced households, particularly mobile homes, should not lead to compliance exemptions as that would only leave these households behind in the clean energy transition, further exacerbating energy equity issues. Instead, CARB should ensure that there is ample support allocated to rural and under-resourced households so that they too may transition to clean and reliable heating when the regulation is enacted.

We remain optimistic that this regulation can benefit, and not further harm, our communities. From the community-led evaluation, we found that the households who received good-quality installation, no bill increases, and working appliances were very satisfied with the Pilot Program. We know that this can be achieved for *all* households with thorough consideration of the necessary work and resources needed to address the barriers to electrification and enable whole-home retrofits for rural and under-resourced households.

If you have any questions about our position, please do not hesitate to reach out to us. Thank you for your time and consideration of these comments.

Sincerely:

BEEP Coalition