

January 18, 2023

Michael Regan  
Administrator  
Environmental Protection Agency  
1200 Pennsylvania Ave, N.W.  
Washington, DC 20460

**Re: Request for Information – Docket ID No. EPA-HQ-OAR-2022-0873 – Climate Pollution Reduction Grants**

Dear Administrator Regan:

We write on behalf of East Bay Community Energy, San Diego Community Power, and Silicon Valley Clean Energy to comment on the Request for Information on the Climate Pollution Reduction Grants.

We are California-based Community Choice Aggregators (CCAs), collectively serving 2.9 million electricity customers across 33 jurisdictions. In California, CCAs serve more than 200 communities, more than 11 million customers, and represent 33% of the electric load in the state. CCAs are public agencies formed by one or more local governments to procure electricity and advance clean energy on behalf of our customers. CCAs are governed by Board of Directors consisting of elected officials or City Councils, depending on the public agency structure of the CCA. We reinvest in our communities through a wide variety of programs, with many focused on decarbonizing buildings and transportation. Our three CCAs are also committed to providing renewable, affordable, and accessible power to our local communities, and accelerating the decarbonization of the grid in California. We are pleased to offer the following comments on the RFI:

- 1. What are the most promising greenhouse gas (GHG) planning and reduction opportunities that could be catalyzed by the Climate Pollution Reduction grants...?*

We are focused on accelerating the decarbonization of transportation and buildings. On the buildings side, residential energy use accounts for roughly 20% of United States emissions, mostly from burning methane gas for space and water heating. To reduce and ultimately eliminate these

emissions, end uses must be electrified, and the gas distribution system decommissioned in a thoughtful and economically fair way. Decommissioning, or 'pruning', will ideally happen on a neighborhood-by-neighborhood level so entire sections of the system can be shut off and those who remain on gas aren't left shouldering all of the maintenance costs. Lower-income households and disadvantaged communities are most at risk for being left behind in this transition. Funding for comprehensive, neighborhood-scale building decarbonization efforts is a gap in existing programs. The Climate Pollution Reduction Grants could provide planning and implementation funding to pilot neighborhood-scale decarbonization, which can then be replicated by other communities.

*2. How should the EPA integrate the needs of underserved communities into the design of this program...?*

Low-income households are found in all regions in California, and low-income people can live in dispersed instead of concentrated geographic areas. Simply using geographic boundaries for identifying underserved communities can therefore miss large numbers of low-income households. We encourage the EPA to consider a broad and flexible definition of underserved communities, including using area-median income, allowing affordable housing developments to qualify as recipients of program funding (regardless of the geographic area), and allowing participation in low-income utility discounts to serve as eligibility (also regardless of geographic area). This will reduce barriers to access funding for underserved communities and low-income households, no matter where they are located.

*12. Please provide any additional comments you would like EPA to consider, which are not covered by the prior questions*

Concerning eligible organizations, we want to encourage the EPA to include Community Choice Aggregators (CCAs) as eligible recipients of program funds. As a direct extension of one or more local governments, CCAs have a unique and close relationship to our communities. . Many of us have a variety of programs that have allowed us to learn about specific community needs and how to best reduce greenhouse gas emissions in our service territories. CCA's are partners that are actively engaged with the community and can effectively distribute funding and

launch programs. Furthermore, our service territories can include smaller jurisdictions that would not have the resources to apply and administer funding on their own. CCAs can also work together on behalf of the cities we serve to coordinate projects that cross our service territory boundaries. CCAs present a natural opportunity to aggregate local government projects so that there's a more regional and collective approach. This kind of approach would serve certain projects well, for example, in coordinating and planning for zero-emission vehicle charging infrastructure to meet the needs of medium and heavy-duty goods movement fleets.

Thank you for considering our comments. We look forward to opportunities to collaborate.

Sincerely,

Nick Chaset  
Chief Executive Officer  
East Bay Community Energy

Karin Burns  
Chief Executive Officer  
San Diego Community Power

Girish Balachandran  
Chief Executive Officer  
Silicon Valley Clean Energy