

Dear Colleagues,

Thank you for providing an opportunity to comment on BPAs draft EE action plan.

My main comment about the plan is that it is VERY underspecified on equity.

The main focus on equity is about portfolio equity between utilities.

There is a comment about social equity but it is limited to low-income households. Equity should be defined in more modern terms and include households of color, underserved populations, marginalized populations etc.

There is a big push for electrification in the region for decarbonization and resilience purposes which typically includes heat pump technologies.

But, these technologies are being adopted by single-family detached, white and Asian households.

Barring significantly more aggressive program incentives and community partnering, they will remain out of reach of underserved households.

Please include explicit targets for reaching out to these customers.

Also, BEETs and BPA funding should require that implementers track the race and ethnicity of residential (and also small commercial) EE measure installations.

Thanks for including these comments in the final version of the action plan.

All the best,

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