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Chair Anderson and Honorable Board of Directors Ava Community Energy 1999 Harrison Street, Suite 2300 Oakland, CA 94612

Subject: CCA Workforce & EJ Alliance Recommendations on SmartHome Battery & Resilience Hub Programs (Nov. 17 CAC Item C5 / Nov. 19 Board Item 12)

Dear Chair Anderson and Honorable Directors,

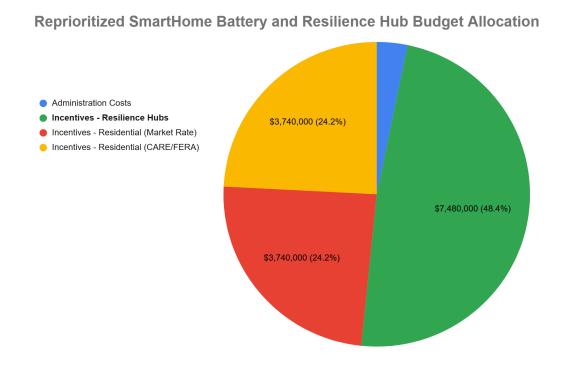
On behalf of the CCA Workforce & Environmental Justice Alliance—a coalition of more than 40 labor, environmental, climate, community, and environmental justice organizations—we appreciate the opportunity to provide input on Ava Community Energy's proposed SmartHome Battery and Resilience Hubs Programs.

We are grateful for the thoughtful work Ava staff have undertaken to advance these programs and for the agency's ongoing commitment to clean energy investments that strengthen community resilience, advance equity, and create high-road workforce and community benefits. Ava's adoption of the Workforce & Environmental Justice Clean Energy Project Selection Criteria last year demonstrated what is possible when community partners and public agencies work together with transparency and shared purpose. We offer the comments below in that same constructive spirit.

As currently designed, the SmartHomes Battery and Resilience Hubs programs represent innovative local development initiatives. Several adjustments are necessary to fully align these programs with Ava's stated priorities and previously adopted standards:

- **1.** Ensure parity between resilience hub investments and residential battery incentives. The current proposal dedicates most funding to market-rate residential installations, leaving limited resources for resilience hubs. We encourage Ava to bring funding for resilience hubs to a level on par with the residential battery program.
- **2. Prioritize a majority of funding for equity and the communities most at risk.** Program funding allocation is the Board's most important policy decision. Resilience hubs provide essential public-good infrastructure. Ava should explicitly prioritize funding for frontline, disadvantaged, and socially vulnerable communities when allocating program funds.
- 3. Support local economic development through local high-road workforce and contractors. Ava has already set a strong precedent through the Workforce & Environmental Justice Criteria for Clean Energy Projects policy. Using clear qualification standards that encourage local and targeted hire priorities, in addition to basic prevailing wage and apprentice requirements, will strengthen community benefits and project quality.
- **4.** Apply lessons from the Critical Municipal Facilities Program by aggregating projects and using an RFQ structure. Bundling projects and using an RFQ process—approaches that have proven effective at Ava and elsewhere—will establish minimum standards, expand the pool of qualified high-road contractors, improve cost efficiency, and ensure consistent project quality and value for clients and Ava.

The following chart helps illustrate our proposed reprioritization of funding to support the refinements requested above:



These refinements would strengthen the program, align it with Ava's adopted policies, and ensure that investments meaningfully advance resilience, equity, and economic opportunity across the service area.

Thank you for your commitment to workers and communities. We look forward to our continued collaboration.

Sincerely,

Eric Veium, Tim Frank, & Leslie Austin Co-directors, <u>CCA Workforce & EJ Alliance</u>