



**November 21, 2016**

Ms. Rajinder Sahota, Branch Chief  
Climate Change Program Evaluation Branch  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**RE: Comments on the 2030 Target Scoping Plan Update: GHG Policy Scenarios, Natural & Working Lands, and Public Health Analysis**

As advocates for residential energy efficiency, the Home Performance Coalition is writing today to emphasize that promoting energy efficiency policies in existing homes is a key aspect to carbon reductions strategies and to bring your attention to a Report we released last week [A Policymaker's Guide to Incorporating Existing Homes into Carbon Reduction Strategies and Clean Power Plan Compliance](#). This report outlines ways in which existing homes are a key aspect to carbon reductions strategies, with details on how they complement the Clean Power Plan (CPP) and how it is imperative that residential energy efficiency become an integral part of state and local carbon regulation strategies.

As an alliance of like-minded organizations working to ensure all homes are healthy, comfortable and energy efficient, HPC believes that making new investments in energy efficiency is a win-win-win for states – it will reduce CPP compliance costs, help meet other state and federal policy goals, and bring immediate benefits to consumers, including reduced energy bills. Energy efficiency programs work – and these programs are far less expensive to fund than paying for new energy generation.

People do not live in commercial or industrial buildings. They do not live in power plants or solar fields. People live in homes. And homes need to be a part of CPP compliance. As utilities and states consider their choices to clean up electricity generation, residential energy efficiency needs to be a critical part of the mix because it provides the highest return-on-investment of any other strategy. The residential sector absolutely needs to be a part of the solution.

Thank you for considering these comments and we look forward to working with you on your future scoping plan. Please contact Joe Cullen, our Director of Policy and State Outreach, at (202) 759-9612 if you have any questions or other matters you wish to discuss.

Sincerely,

Brian T. Castelli  
President & CEO  
Home Performance Coalition