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Environmental Protection Agency
EPA Docket Center (EPA/DC)
Mail Code 28221T

Attention Docket ID No. EPA-HQ-OAR-2016-0033,
1200 Pennsylvania Avenue, NW,
Washington, DC 20460

To Whom it May Concern:

Voces Verdes appreciates the opportunity to comment on the Clean Energy Incentive Program (CEIP). The Environmental Protection Agency's (EPA) work to ensure public concerns are accounted for is critical when considering this important aspect of the Clean Power Plan (CPP).

Voces is a non-partisan network of Latino leaders committed to transforming and diversifying the voices speaking out for action on climate, clean, renewable energy, and a healthy, sustainable, prosperous future for all. Since our inception in 2009, we have grown to include groups representing millions of Latinos across the country as well as some of the most influential Latino leaders nationwide. Our mission remains ensuring that Latino support for a healthy sustainable future for our community and our world is heard and considered a meaningful addition to developing the solutions needed to fight climate change and further the use and development of clean renewable energy in a way that benefits all and ensures equity and justice.

Voces supports the CEIP as a critical piece of the CPP that will provide benefits by incentivizing investments in energy efficiency and renewable energy in low-income communities which have historically had little access to clean energy and the jobs associated with it. The CEIP has the potential to create environmental benefits in communities that need it most by helping states meet their Clean Power Plan goals while encouraging low-income access to clean, renewable energy and energy efficiency programs.

It is well-established that Latinos and African Americans overwhelmingly support action on climate. 82% of African Americans want to see strong state plans that focus on clean energy and energy efficiency investments. Over 90% of Latinos want energy efficiency and renewable energy to be part of the policy solution for climate change. The CEIP encourages these investments.

Low-income communities often bear a disproportionate share of the health harms caused by fossil fuel-fired power plants and spend a higher percentage of their incomes on electric bills. A recent [report](#) from the American Council for an Energy-Efficient Economy (ACEEE) and the Energy Efficiency for All coalition, found that, on average, low-income households pay more than twice as much as the average median income household (7.2% of household income spent on utilities vs. 3.5%) and three times greater than higher income households (2.3%). Importantly, the report finds that African-

American and Latino households spend disproportionate amounts of their income on energy (42% African-American and 68% for Latino households).

A chronic lack of investment in efficiency improvements and weatherization in affordable housing as well as solar power in low-income neighborhoods can be addressed by the CEIP if focused on low-income programs by incentivizing new projects and helping to expand existing programs in a manner that would not occur without the program.

By lowering barriers to access and providing low-income communities and communities of color with credits that allow them to derive the benefits and savings associated with the expansion of energy efficiency and clean energy sources, the CEIP can facilitate more equitable outcomes in state implementation plans as we transition to a clean energy economy.

Latino business leaders—like many of our Voces partners—will benefit from the CEIP as well. Latinos [opened 86%](#) of all the new businesses created in the U.S. between 2007 and 2012, and the CEIP will help these business owners see a major payoff – some estimate around [\\$11.3 billion annually](#) by 2030.

For all of its benefits, Voces encourages EPA to consider the following improvements to the CEIP:

- a. Develop clear guidance in the final CEIP on appropriate “low income” thresholds for states so that these definitions are as inclusive of low-income individuals, households, and communities as possible and ensure those benefitted are truly low-income communities rather than other entities.
- b. Establish a mechanism for meaningful engagement to ensure that local communities can provide feedback on projects happening in their communities.
- c. Environmental justice analyses of CPP implementation plans should assess any adverse impacts of the CEIP on frontline communities. If a certain fossil fuel-fired power plant is adversely affecting a community, such plant should decrease, not increase its pollution.
- d. Clarify and develop guidance documents in the final CEIP to ensure that job creation results in communities where those projects will be deployed, with family-sustaining wages, and good benefits.
- e. Provide clarification on which "businesses" and "commercial buildings" in low-income communities are eligible for low-income energy efficiency projects; include churches, schools, hospitals, and municipal institutions that are providing electricity savings, credits or other benefits to low-income communities as eligible for CEIP credits.

Voces recognizes the importance of the CEIP in ensuring equity under the CPP and encourages EPA to develop these areas further in order to ensure that clean energy and pollution reductions deployed in low-income communities under the program truly benefit the intended communities. This program presents a unique opportunity for states to develop more equitable implementation plans, and if effectively implemented, will be a key step towards protecting our communities, growing clean energy in our country and building a more sustainable, prosperous future. We welcome future opportunities to work with EPA to develop this and other critical policies to fight climate change and benefit the health and wellbeing of our communities.

Sincerely,

Voces Verdes