



Induction Cooking Market Transformation Initiative

Appendix G: Risk Management Plan

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CalMTA is a program of the California Public Utilities Commission (CPUC) and is administered by Resource Innovations

Introduction

This document details the potential risks that could negatively impact the Induction Cooking Market Transformation Initiative (MTI) and CalMTA's plan to monitor and mitigate the risks. Additional information is included to establish the severity of the risk, likelihood of occurring, indicators that the risk is occurring, and assumptions around the possible mitigation approach. If the risk is designed with an "*", then the risk is listed in Section 9 of the Induction Cooking MTI Plan as part of the summary of key risks that could impact this MTI.

The risks are listed in the chronological order in which we expect them to become evident (assuming do they occur), generally corresponding to the timing of CalMTA's planned strategic interventions. For example, the first risk is associated with one of CalMTA's first interventions: engaging manufacturers and motivating them to invest in the development and commercialization of a 120V battery-equipped induction range that meet the needs of California's electrical infrastructure. We are defining "high," "medium," and "low" for each risk as follows.

For "Probability of Occurring" in the third column, CalMTA is defining:

- **High:** Through our research and discussion with market actors, CalMTA deems this risk having a high probability of occurring. The program needs to monitor closely and identify a solid backup plan with resources that can be deployed to mitigate the risk if it comes to fruition.
- **Medium:** This risk has a medium probability of occurring given what we know about the market. The MTI needs to track and have a plan to mitigate.
- **Low:** The probability of this risk occurring is low based on what know about the market to date. It could have some impact on the need for resources and timing, so the MTI needs to track it.

For "Severity" in the fourth column, CalMTA is defining these as follows:

- **High:** If this risk plays out and our mitigation approach is unfeasible, then the success of MTI may be in jeopardy.
- **Medium:** This may have an impact on the timing or overall success of the MTI, but a solid mitigation approach exists, and the MTI will be able to pivot with more time or resources.
- **Low:** This level of risk will likely require a program intervention adjustment, but it will not jeopardize the timing or resources needed level.



Appendix G: Risk Management Plan for Induction Cooking

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Table 1. Risk assessment

	Risk	Probability of occurring	Severity	How will we know the risk is occurring?	Responsible & tracking ¹	Mitigation approach
1*	Large enough demand signal for manufacturers: Multifamily (MF) building owners do not agree to purchase enough units of the product described in the Tech Challenge, resulting in a smaller than needed demand signal for manufacturers to invest in the development of the product.	Medium	High	Engagement with MF building owners Engagement with manufacturers to better understand the development of products that serve the MF market	Strategy Manager and Program Manager	Work with MF building owner trusted partners to get additional signed agreements in place. CalMTA could pay a portion of the product costs to reduce cost to building owners or CalMTA develops bulk purchase pricing with manufacturers to help reduce costs. CalMTA couples promise to purchase with another program like Energy Savings Assistance (ESA) to help offset costs.
2*	MF building owners' willingness to overcome initial price/upfront costs associated with induction: Owners of MF may not be willing to pay the additional costs likely to be associated with purchasing and installing induction cooking products in their units.	Medium	Medium	Responses to Tech Challenge Interviews with MF building owners	Strategy Manager and Market Research and Evaluation Lead	CalMTA subsidizes incremental costs for some buildings in MF building owner portfolio. Negotiate bulk purchase agreements with manufacturers to drive down unit costs. Demonstrate induction's substantial benefits in terms of resilience, load shifting, and operating costs for tenants.
3*	Manufacturer response to product that meets California needs: Manufacturers do not respond to Tech Challenge with product roadmaps that meet 120V electrical needs of California market and at a reasonable price point for low-income consumers. ²	Medium	High	Engagement with manufacturers and lack of response to Tech Challenge	Product Management	Show market that it can be done through two manufacturers that we know have already done it. Facilitate and support the expansion of the intellectual property for the battery-equipped product from one of the startup manufacturers to other manufacturers. Reward the two known manufacturers that currently have the product with the entire MF order to stimulate competition and other manufacturers to join. Build a larger demand signal with California programs and other partners targeting a broader set of MF building owners. Explore alternatives solutions that mitigate the need for electrical panel upgrades for consumers changing from gas to electric cooking.
4	Induction product quality and maintenance costs: Being a newer, electronic product compared to gas cooking products, there is a risk associated with product quality and possible repair costs which are known to be higher for induction.	Medium	High	Consumer and builder surveys Manufacturer engagement	Market Research and Evaluation Lead and Product Management	Engage manufacturers on product improvements that impact product quality and durability. Require longer warranties and warranties that cover induction-specific issues, like electronics problems due to voltage spikes from manufacturers for induction products through Tech Challenge. Work with ENERGY STAR to include increased warranty requirements.

¹ The roles listed under the column "responsible & tracking" will be on point to track and identify if the risk is something that needs attention. The team will then work to deploy the appropriate mitigation strategy.

² According to Assembly Bill 1550, low-income communities and households are defined as those who live in census tracts or households at or below 80% of the statewide median income or meeting the threshold designated as low-income by the California Department of Housing and Community Development's Revised 2021 State Income Limits. CalMTA uses the term "low-income" to describe individuals or households whose income status poses a barrier to adoption of the technology.



	Risk	Probability of occurring	Severity	How will we know the risk is occurring?	Responsible & tracking ¹	Mitigation approach
						Engage retailers on requiring increased warranties from their manufacturer partners. Identify and then engage repair market actors in California and engage on ways to drive repair costs down (i.e., increase training, manufacturers engagement).
5*	Consumer and builder perception about induction: Consumers and builders continue to perceive gas cooking as superior and are not willing to make the switch to electric cooking.	Medium	High	Consumer and builder surveys	Market Research and Evaluation Lead	Deploy targeted information campaign on health benefits of induction cooking with trusted health advocates. Deploy additional “Chefluencer” events to consumers and builders coupled with a more direct marketing campaign from CalMTA (not just through the hands of others). Expand loaner programs to get induction into the hands of consumers. For builders/new construction, if the range is the lone gas appliance, emphasize the cost of running a gas connection for just one appliance. Incentivize builders for including induction in model homes even if gas remains a buyer option.
6*	Consumer and builder perception about health impacts of gas cooking: Consumers and builders do not believe or act on the messages that gas cooking negatively impacts the health of occupants.	Medium	High	Consumer and builder surveys	Market Research and Evaluation Lead	Identify and work with additional third-party, credible partners (universities, public health advocacy partners, foundations) to develop trusted data and messages on impacts of gas cooking on occupant health. Expand marketing tactics to focus on this message. Deploy health advocates to deliver message on benefits of induction cooking on improved indoor air quality (IAQ).
7*	Induction cooking and culture wars: The negative publicity and culture wars around regulating cooking products dampens policymakers’ motivation to regulate the sale of gas cooking products.	Medium	Medium	Engagement with policymakers in California	Strategy Manager	Support policymakers with data, builder and market partners support to counter negative publicity. Continue to focus on benefits and price declines of induction as an alternative to gas cooking. Expand influencer campaign with celebrity chefs.
8	Perception of battery-equipped products by consumers and MF building owners: Consumers and owners of MF properties do not understand and embrace the new functionality offered by battery-equipped products (resilience, cooking off peak).	Low	Medium	Consumer and builder surveys	Market Research and Evaluation Lead	Support additional pilots and demonstrations that can then be used as case studies and messaging on the benefits of battery-equipped products. For MF building owners, document financial benefits of battery-equipped products (mitigation of electrical upgrades) and reduced operating expenses while charging off peak. Partner with utilities offering demand response rates/incentives to demonstrate the cost-saving benefits of off-peak charging of induction cooking appliances. Target demonstrations in areas with frequent power outages to show the resilience benefits of battery-equipped products.



	Risk	Probability of occurring	Severity	How will we know the risk is occurring?	Responsible & tracking¹	Mitigation approach
9	Inclusion in California programs: Programs that support environmental and social justice (ESJ) communities (energy efficiency, direct install, weatherization, electrification programs), fail to include this measure in their programs.	Low	Medium	Engagement with Program Administrators (PAs) and manufacturers, CEDARS database	Strategy and Program Manager	Support program inclusion through data and market support (manufacturers, retailer, community-based organizations (CBOs) and marketing support). Support programs through bulk purchase agreements to bring down cost for ESJ communities.
10	Building owners and battery-equipped technology: Building owners, especially owners of MF buildings, do not allow the battery-equipped technology to be installed in their properties (due to possible fire hazard).	Medium	Medium	Building owner surveys	Market Research and Evaluation	Support development of research and white papers that detail low risk of the type of batteries included in induction cooking products. Work with induction cooking and battery manufacturers to document low risk of the type of batteries included in induction stoves. Partner with local health and safety leaders (fire departments, code officials, insurance providers) to educate MF building owners on low risk.
11	Prices of batteries: The price of batteries does not decline enough to help reduce the overall cost of 120V battery-equipped products for ESJ communities.	Medium	Medium	Manufacturer engagement	Product Management	Support policy makers that are trying to ensure that smaller batteries are included in Inflation Reduction Act (IRA) incentives than those currently specified in IRA. Encourage utility programs to provide higher incentives targeting induction products that are battery-equipped. Partner with induction manufacturers who also produce batteries on price declines.
12	Retailer stocking practices: Retail partners do not change stocking practices to focus on more affordable induction cooking products in stores that are designated as serving predominantly ESJ communities.	Medium	Medium	Retailer sales and stocking data from ENERGY STAR Retail Products Platform (ESRPP) program, interviews with retail merchants	Strategy and Program Manager	Develop marketing plans with some retailers at targeted stores that support ESJ communities to push for greater demand. Provide bonus incentives and other marketing strategies at local independent retailers who focus exclusively on ESJ communities.
13*	Electrification rates in California: California utilities roll out electrification enabling rate structures, especially for ESJ communities, slower than anticipated. Without these rates, consumers will not be able to tap into the benefits of moving to induction cooking and adoption will be slowed.	Low	Medium	Engagement with policymakers, advocacy groups, the CPUC, and utility partners	Strategy and Program Manager	Across all CalMTA consumer product MTIs (Heat Pump Water Heating, Room Heat Pumps, and Induction Cooking) support policy makers and advocates in the movement towards electrification friendly rates through bill impact information, avoided costs, and other non-energy benefit for the consumer.
14	Impact of new administration on IRA funding: The new administration discontinues tax credits that cover induction cooking products and/or they expire before this MTI is able to leverage them.	Medium	Low	Engage with the DOE, EPA, manufacturers, California Energy Commission, and PAs	Strategy and Program Manager	Continue to push for RHP inclusion in other types of programs. Provide layered bulk purchases of efficient cooking products. Engage CBOs on layered bulk purchasing pricing for efficient cooking products. Engage online energy efficiency platforms that offer financing options for ESJ consumers with targeted induction promotions.
15*	Consumer price: The price of induction cooking products does not decline enough to compete with gas cooking.	Medium	High	Sales data collection, interviews with manufacturers	Market research and evaluation	New specification to manufacturers that targets basic models of induction cooking that does include features that drive costs up. Continue to push for induction inclusion in other types of programs to help bring down costs.



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16	ENERGY STAR specification 2.0 for cooking products: The Environmental Protection Agency (EPA) does not update the ENERGY STAR specification for cooking products within the medium term (3-6 years).	Medium	Low	Engagement with EPA and national stakeholders	Strategy and Program Manager	<p>Provide data and proof of market acceptance in California to EPA's ENERGY STAR program.</p> <p>Develop California induction specification.</p> <p>Continue to partner and expand efforts to support other voluntary standards and specifications.</p> <p>Ensure continued tracking of market share, awareness and other relevant data so that when EPA restarts ENERGY STAR efforts, they will be able to rapidly update specifications to capture gains acquired during previous period.</p>
17	Additional policies and code changes: California policy makers and code officials fail to pass additional policies and code changes for new construction that favor electric cooking over gas products (gas labeling, additional code requirements to include gas cooking).	Medium	Low	Engagement with policymakers and Codes and Standards Advocacy partners	Product Management and Strategy Manager	<p>Provide policymakers with data and results from demonstrations that show what is possible from a policy perspective.</p> <p>Influence and aggregate additional partners to support policy changes.</p>