



February 7, 2018

Nick Chaset
Chief Executive Officer
East Bay Community Energy
1111 Broadway, Third Floor
Oakland, CA 94607

Sent via email only to LDBPcomments@ebce.org

Re: Local Development Business Plan – Energy Efficiency Assessment Draft

Dear Mr. Chaset,

The Association of Bay Area Governments (ABAG), on behalf of the San Francisco Bay Area Regional Energy Network (BayREN), is pleased to submit these comments to the Energy Efficiency Assessment Draft Chapter (EEA) of the East Bay Community Energy (EBCE) Local Development Business Plan (the Plan). BayREN appreciates the significant effort that went into researching the existing energy efficiency landscape within Alameda County that informed the recommendations. We are supportive of the proposed phased approach to energy efficiency (EE) program implementation and we look forward to working side-by-side with you as a key stakeholder. Below, we offer some specific comments.

BayREN supports the recommendations and the phased approach articulated in the EEA. Alameda County residents and businesses are fortunate to have a vast array of energy efficiency offerings from BayREN, East Bay Energy Watch, StopWaste (through the Energy Council), and additional city programs. However, the local and state goals regarding Green House Gas (GHG) reductions can only be met with additional strategies and EBCE is well positioned to move the needle. Most of the current programs within the county are funded with EE dollars from the CPUC. With these funds come restrictions on how they can be used including prohibitions against electric vehicle programs and renewable energy. A holistic approach to GHG reductions is paramount to reaching California's goals as well as those identified in local Climate Action Plans. EBCE, like other CCEs in the region, is well poised to leverage existing programs to allow for more customer options. Sonoma Clean Power's (SCP) EV program, mentioned on page 14 of the EEA, is illustrative.

SCP made the promotion of EVs one of their focus areas. They created partnerships with local auto dealers and provide rebates to offset the cost of EVs. With more EVs on the road, the need for charging infrastructure increases. Rather than develop a new program, SCP trained BayREN implementers about EVs in general and their offering, and has provided a small amount of funding

so that this information can be provided to their customers. BayREN multifamily outreach in Sonoma County¹ now includes information about EVs; customers are also referred to SCP's program. This is a good example of how a CCE can leverage an existing program – with little monetary expenditures – to provide co-benefits to the customer, find uptake in their own programs, and help meet climate related goals.

BayREN agrees that “[n]ext to its customers, data is a CCA’s most valuable resource...[as u]nderstanding the specific consumption patterns...enables strategic, targeted, and tailored decision-making that maximizes benefits and reduces risk.” (EEA at page 21.) Neither BayREN, East Bay Energy Watch nor other implementers in the County have access to this data given the privacy concerns asserted by PG&E. Analysis of customer data presents a great opportunity for EBCE to work with existing program administrators to better target customers.

Another example of effective collaboration occurred in response to the horrific wildfires in Sonoma County, after the EEA was released for comment. SCP was a “first responder” with the rebuild effort and is trying to ensure that homes are rebuilt safer and more efficiently. SCP is working with PG&E to expand the utility’s new construction residential program to provide enhancements so that it is more attractive and appropriate for individual property owners who lost their homes. SCP (and PG&E) have asked BayREN to join this partnership and we are currently working through the details. This CCE/IOU/REN partnership is an example of effective collaboration to leverage existing programs for the benefit of the community and is also one that we hope can be replicated in other parts of the region.

BayREN’s Business Plan² - currently pending before the CPUC - identifies two new program sectors: Municipal, focused on energy management systems for public buildings, and Commercial, which targets Small-to-Medium Businesses. We encourage EBCE (and other CCE’s in our region) to collaborate with us as we develop our Implementation Plan once the Business Plan is approved. The EEA (at page 37) identifies Small-to-Medium Businesses as a good place for EBCE to look for load reductions through energy efficiency program deployment, and we invite you to work with us as we finalize our program design.

We would like to highlight the value of StopWaste and the Energy Council both to BayREN and Alameda County. Staff has longstanding relationships with Alameda County cities and their constituents. They have designed award winning EE programs, and their expertise in the multifamily sector is frequently recognized by the CEC and CPUC. StopWaste designed (and is the lead agency for running) the BayREN multifamily program (BAMBE). To date, BAMBE has completed more projects and claimed more energy savings than all of the California Investor Owned Utilities combined. In Alameda County alone, 4,605 multifamily units have been retrofitted and \$3,454,500 in

¹ Mendocino County is not part of BayREN’s territory.

² Viewable at <http://www.bayren.org/resources>.

rebates have been provided to Alameda County multifamily property owners. StopWaste is a key stakeholder and collaborator for EE within the County.

We are very excited about the opportunity to work with EBCE in the future to help meet the local and state goals of reducing GHG emissions. We provide our full support of the recommendations in the EEA and are ready to help you implement these suggestions.



Gerald L. Lahr
Energy Program Manager



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BayREN Program Manager

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