

Dear LDBP:

Thank you for undertaking this important work to maximize the impact of EBCE. This work is important not just in Alameda but beyond. While I recommend challenging a number of the underlying assumptions in the document these are intended to be constructive as we all wish EBCE and other CCEs to succeed.

Overall, the document is well presented and structured. It includes valuable elements, especially the workforce framework and ideas such as the community investment fund. Heavy duty electrification is very important for local air quality and emissions so that is good to have been identified.

Surprisingly, the document appears to omit the largest economic value and biggest emissions target - light-duty vehicle electrification. It is also probably the fastest to move quickly. Converting gasoline funds lost out of people's pockets and lost to the region into savings in people's pockets and funds kept in the region is probably the largest impact EBCE can have. A major emphasis on vehicle and infrastructure is likely to pay dividends and should be a big early action. It also delivers jobs and workforce opportunities.

The document also includes a number of conventional concepts which may no longer reflect the current conditions and not well serve EBCE. In particular, both the Renewables and Efficiency concepts largely neglect to consider Duck Curve implications including time of emissions.

For example, there is a heavy emphasis on starting with RE (NEM, FiT, etc) but the value of additional incentives in plain RE has diminished dramatically as a) wholesale solar is far less expensive, b) there is excess supply, c) rate schedules are shifting to make plain PV less valuable, and d) the state has put in place a solar mandate on new construction. It may be worth focusing PV efforts solely on incentivizing PV+storage.

On EE there is no discussion of time valuation of EE and portfolio EE strategies - both much more likely to be valuable. Conventional EE strategies do not differentiate when the EE is delivered. EE in the belly of the duck is increasingly less useful and even harmful whereas there is an urgent need for EE in the head of the duck.

The document opens with recommendations to pursue DR. DR market is very complex and likely to be highly demanding to implement properly (BIP, etc.) and at the same

time with likely low yield absent broader VPP strategy. Most low hanging DR is probably taken. Risk of spending a lot of time with little payoff.

Building scale wind is called out as worth pursuing however forward-looking knowledgeable designers are not promoting building scale wind due to technology issues, building issues, and weak wind resource in most cases. This is likely of very low value.

Sincerely,

-Rafael Reyes