



StopWaste is the Alameda County Waste Management Authority, the Alameda County Source Reduction and Recycling Board, and the Energy Council operating as one public agency.

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February 7, 2018

To: Nicolas Chaset, CEO, and Board of Directors, East Bay Community Energy
Sent via email only to LDBPcomments@ebce.org

Re: Local Development Business Plan, Energy Efficiency Assessment Draft

Dear Mr. Chaset and the Board of Directors,

Thank you for the opportunity to comment on the draft LDBP Energy Efficiency (EE) Assessment. We value the time and effort put into the document. The Energy Council staff in consultation with the Technical Advisory Group (TAG) offer the following comments.

- The draft EE Assessment was very thorough and emphasized a collaborative path forward, one which the Energy Council strongly supports. We look forward to partnering with EBCE on regional efforts to reduce energy consumption and GHG emissions through EBEW, BayREN and future programs.
- The Energy Council appreciates the recognition of energy efficiency programs that are already in place and are effectively serving customers in Alameda County. Below are some programs for which we wanted to provide a more description, as they could be a resource for EBCE and a foundation for energy efficiency efforts in years to come:
 - BayREN's BAMBE (Bay Area Multifamily Building Enhancements) provides incentives per unit (\$750) for energy upgrades. As of 2017, 4,606 units had been upgraded with these funds. These units represent 18% of Bay Area wide program participation, but only 3% of units in the county.
 - BayREN's Home Upgrade and Advanced Home Upgrade reached over 1,500 single family homes in Alameda County in 2017 with funds to make residential buildings more energy efficient. This represents less than 1% of homes. StopWaste's Energy Council engages home owners through workshops, home tours and collaborations with community groups as outreach tactics, explaining the programs and the incentives.
 - EBEW's program for small and medium businesses delivered 7.4 million kWh of energy saved in 2017 through lighting, HVAC, refrigeration and control systems.
 - Your Energy Manager, a Microloan program and Green Business coordination with EBEW helped small, hard-to-reach businesses expand energy efficiency.

- Civic Spark, an 11 month fellowship embedded in local government agencies, added much needed capacity for jurisdictions doing more at the local level and regionally. In 2017/18 12 Fellows serve in 14 EBEW cities, 8 of which are in Alameda County (Alameda, Albany, Dublin, Fremont, Dublin, Oakland, Piedmont and San Leandro).
- Rising Sun's CA Youth Energy Services (CYES) provided Green House Calls to 1026 residences looking for easy water and energy saving options. This program employed 33 youth in 2017 in 6 Alameda County cities (Dublin, Fremont, Oakland, Pleasanton, San Leandro and Union City).
- EBEW's Municipal Implementation Team trained building operators and supported city efforts to make municipal buildings more efficient with new technologies and demand response. These included pilots with Lucid advanced energy monitoring system and other Automated Demand Response (ADR) systems, Energy Service Company (ESCO) project support, and assistance in securing PG&E's On-Bill Financing.
- In 2018, EBEW is supporting two projects: piloting a Heat Pump Water Heater installation project, and conducting a consolidated GHG data inventory contract for jurisdictions to measure implementation of Climate Action Plans (CAP), and to streamline the inventory process moving forward, leaving more resources for CAP implementation.
- The Energy Council recognizes that, once up and running, EBCE will be in a strong position to use more granular customer data (including time of use) to target and inform energy efficiency efforts in Alameda County. This would increase the number and strength of collaboration opportunities in the next generation of EE programs, along with targeting energy demand at peak hours, not just overall or average consumption.
- Pay for Performance (P4P) programs provide new ways to explore greater efficiency and better targeting of programs. We are interested in ways that P4P can ensure cost-effectiveness in programs within the county. At the same time, the need for deep energy retrofits and meeting local and state Climate Action Plan objectives cannot be supported by pay for performance alone, which target "low-hanging fruit" measures.

The Energy Council is also concerned about issues that are not directly related to energy efficiency. We want to share with you some of the TAG priorities that cities are paying close attention to in order to realize Climate Action Plan goals.

We recognize the risk mitigation in using Metered Energy Efficiency Transaction Structure (MEETS) outlined in the Draft EE Assessment, but also see ample opportunity for electrification of energy uses, with fuel switching for vehicles and other common gas appliances (water heating, space heating) happening in the market. As more uses move from gas to electricity, electricity demands will increase. As a result, concerns over decreased electric demand through efficiency measures may be displaced.

The Energy Council encourages EBCE to take a leadership role in promoting electrification and decarbonization in Alameda County. In order to meet state GHG reduction targets, every region and CCA will need to actively work toward less carbon intensive sources of energy, both in the procurement and in end uses.

We appreciate EBCE staff engaging with Alameda County jurisdictions' staff at our monthly Technical Advisory Group (TAG) meetings for the Energy Council beginning in late 2017. We hope that this collaboration will continue, and invite EBCE to also attend quarterly East Bay Energy Watch (EBEW) meetings of the Strategic Advisory Committee (SAC), which is under the Local Government Partnership with PG&E.

Thank you for providing a well-planned and collaborative roadmap within the Energy Efficiency Assessment document. Our comments are provided in a supportive way, as we want to ensure that EBCE has a strong start in 2018 with many years of supporting local government, business and residential efforts to reduce GHG emissions through carbon-free energy procurement, reduction and efficiency of use.

Sincerely,



Karen Kho
Senior Program Manager
StopWaste

Cc: Wendy Sommer, Executive Director, StopWaste
Energy Council Technical Advisory Group (TAG)