

Energy - Docket Optical System

From: Marika Erdely [marika@greeneconome.com]
Sent: Monday, July 21, 2014 3:21 PM
To: Energy - Docket Optical System
Subject: Enforcement not Delay in regards to AB 1103.

California Energy Commission

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Hello,

After hearing all of the Panels at the July 2, 2014 AB 1103 Workshop, I found it interesting that I did not hear any barriers with compliance as the CEC suggested.

Panel 1: Other jurisdictions clearly are able to implement and move at a faster pace than California. Clearly, the issue is more on California's CEC's inability to properly communicate and educate the stakeholders in a timely fashion as did other jurisdictions. This doesn't matter, as there have popped up cottage industries to provide this education.

Panel 2: Building Owner's and Real Estate Industry:

The Building Owners currently Benchmarking their buildings, don't seem to have a problem. Sure, the Real Estate Industry will fight additional regulation, but this is expected. This is not a barrier to entry, this just requires more adamant communication and Enforcement and the news will spread and they will comply.

Panel 3: The utilities were able to work with the building owners and provide the energy usage data. Sure, there are the issues of privacy and whole building data, but neither of these currently prevent the energy data from being provided for AB 1103 Compliance.

We are a service provider for AB 1103 report preparation, as well as, provide educational presentations to Stakeholders. We understand the market and are on the ground floor. Delaying this law will do the following:

- 1) Even less people will comply because they won't think the CEC is taking this law seriously.
- 2) These small building owners will be punished with higher energy costs, as they occur, without the visibility as to how energy efficient their building is and won't be able to take advantage of the current level of utility rebates available. These small business owners are the ones that should benefit from the rebates, so they can reduce their costs and stay in business.
- 3) Lack of enforcement provides many with a justification as to why not to comply.
- 4) Delay California's recovery from the recession affecting the construction industry. AB 1103 gets California's construction industry back to work making energy efficiency retrofits.

The Solution is to Enforce the law, not delay its full implementation.

Our recommended solution:

- 1) Costar has a wonderful historical data base of commercial buildings that have closed escrow throughout the state. Screen shot attached.
- 2) Internally at the CEC or this could be sub-contracted out, a reconciliation of AB 1103 compliance reports received vs. this Costar report of closed Escrows could clearly identify who hasn't complied.
- 3) Letters could be sent demanding compliance and if no compliance is received in 60 days, then fines could be levied.

Focus on Enforcement, not delay!

Regards,
Marika

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