

DOCKETED

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Green Cities California response to EBEE Draft Action Plan

Please see attached document.

Additional submitted attachment is included below.

BEFORE THE CALIFORNIA ENERGY COMMISSION

Docket #: 15-IEPR-05 Project

Title: Energy Efficiency

COMMENTS OF

GREEN CITIES CALIFORNIA

ON

EXISTING BUILDING ENERGY EFFICIENCY ACTION PLAN- DRAFT 2015

I. INTRODUCTION

Green Cities California (GCC) was established in 2007 and is a member-led organization that supports an active network of the most progressive local governments across California. A priority of member cities is to significantly reduce greenhouse gas emissions, and Climate Action Plans focus on energy efficiency and renewable energy as a primary strategy. GCC has had two meetings with CA Energy Commission (CEC) staff, one in person and one by conference call, to specifically discuss existing building-level data access. This is critical in order to complete energy use benchmarking for commercial building (residential and non-residential) so that inefficient buildings can be identified and assisted. For some of our GCC members, data access is also a cornerstone for commercial building disclosure. Below are additional comments for consideration regarding the 2015 draft of the Existing Building Energy Efficiency Action Plan (Action Plan).

II. COMMENTS

A. Goal 1 includes Nonresidential Energy Benchmarking and Disclosure (S 1.2) and required periodic benchmarking of commercial and multi-family buildings above 50,000 square feet in floor area.

COMMENT: GCC strongly supports whole building data access for commercial and multi-family buildings above 50,000 square feet.

B. Milestones and Outcomes-

a. By 2016, all California utilities provide whole building energy use data to building owners and their agents upon request.

COMMENT: GCC would request consideration of additionally requiring ANNUAL REPORTING OF THE DATA TO LOCAL GOVERNMENTS UPON REQUEST. FURTHER, THIS DATA SHOULD BE AVAILABLE BEGINNING IN 2016.

b. By 2018, energy asset ratings are considered in real estate appraisals and included in property listings.

COMMENT: GCC would request consideration of that fact that there are currently Multiple Listings that include energy consumption information about the property, provided on a voluntary basis, and that this transition to a MANDATORY PROGRAM FOR COMMERCIAL BUILDINGS AS WELL AS RESIDENTIAL CAN BE ACCOMPLISHED BY 2017, IF NOT SOONER.

- c. By 2020, efforts of state and local governments to lead by example results in documented energy use reductions in public buildings.

COMMENT: GCC DISAGREES WITH WAITING UNTIL 2020 FOR REPORTING ENERGY SAVINGS IN PUBLIC BUILDINGS AND RECOMMENDS THAT ALL LOCAL AND STATE AGENCIES BE REQUIRED TO REPORT THIS DATA TO THE CEC BEGINNING IN 2015, WITH 2009 AS A BASELINE. THIS WOULD COINCIDE WITH THE PROVISION OF AARA FUNDING TO LOCAL GOVERNMENTS.

- C. STRATEGY 1.2.5 Potential Mandatory Programs: Review the Benchmarking and Disclosure program to determine if it motivates improvements and results in sufficient savings; make recommendations regarding mandatory retrofits and/or retrocommissioning are necessary to deepen savings in large commercial buildings.

COMMENT: There are a number of benchmarking and disclosure programs in the nation that have demonstrated effective energy reduction. THEREFORE, GCC RECOMMENDS THAT THE CEC, CPUC, GOVERNOR'S OFFICE AND LEGISLATURE CONSIDER THE MERITS OF MANDATORY PROGRAMS BEGINNING IN 2017 WHEN THE FIRST SET OF ANNUAL DATA IS AVAILABLE. THE SUGGESTED TIMELINE SHOULD BE ACCELERATED.

- D. STRATEGY 1.7 Local Government Leadership

COMMENT: GCC STRONGLY SUPPORTS THE *LOCAL GOVERNMENT CHALLENGE PROGRAM* AND APPRECIATES THE RECOGNITION THAT ADDITIONAL FUNDING IS BENEFICIAL TO STIMULATE ADVANCING

MORE SUSTAINABLE POLICIES AND PRACTICES AT THE LOCAL
GOVERNMENT LEVEL.

III. CONCLUSION

GCC agrees that successful implementation of the strategies presented, WITH THE SUGGESTIONS MADE HEREIN, are essential to get California on the right trajectory to meet the goals previously identified in the 2008 Long-Term Energy Efficiency Strategic Plan. Local governments are dependent upon significant gains in energy efficiency in order to meet their own Climate Action Plan goals. The overall theme in the GCC comments is that the timelines need to be accelerated in order to stimulate action sooner rather than later.

Respectfully submitted.



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