

DOCKETED

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Benicia Comments on Draft Action Plan

Additional submitted attachment is included below.

May 5, 2015

Commissioner Andrew McAllister
California Energy Commission
1516 Ninth Street, MS-29
Sacramento, CA 95814

RE: Docket # 15-IEPR-05, AB 758 Energy Action Plan

Dear Commissioner McAllister:

The City of Benicia understands the opportunity and challenge of addressing energy use in existing buildings. In Benicia, 48% of community-wide greenhouse gas (GHG) emissions are generated from existing building energy use, the largest percentage of emissions in the city. The Existing Buildings Energy Efficiency Action Plan represents a great step forward in developing policies and programs that successfully reduce energy use and related emissions in communities across California. Benicia has been actively engaged in reducing energy use in all sectors through its residential and commercial energy efficiency and sustainability programs. Below are the City's comments, which are reflective of the experience gained by implementing programs on-the-ground in Benicia.

1. Focusing on buildings less than 50,000 square feet while relying on local governments to develop programs to assist these smaller businesses to benchmark and report energy will achieve energy reductions because cities can leverage existing relationships. But the plan should acknowledge the additional demands this puts on small businesses and local government staff.
2. Provide ample opportunity for small and medium sized businesses to participate in trainings so they clearly understand benchmarking and reporting requirements; rely on already established City-specific outreach and education channels and existing relationships with local businesses and business organizations to increase compliance rather than developing entirely new marketing and outreach programs managed by third-parties.
3. If and when retrofits and retro-commissioning become mandatory (per the Action Plan), funds should be designated for local efficiency and sustainability programs that have proven successful. For example, Benicia's Business Resource Incentive Program (the City's no-cost business sustainability assessment and funding (grants/revolving loans for efficiency upgrades) program that could be utilized to assist businesses to complete retrofits, track savings, and report on a monthly, quarterly, or annual basis.

4. Data sharing protocols should allow local governments to have building level energy use data without having to complete a comprehensive security audit currently required by utility companies. This data is essential to target business owners that would benefit most from benchmarking and energy efficiency financing.
5. Plan should consider that development of Strategic Energy Plans will place additional financial and staff demands on small businesses; it should be integrated into existing business planning frameworks, e.g. maintenance and operation plans that are often changed more frequently than long-term strategic plans and already have resources allocated to update these documents; creating a separate energy-focused plan often times is not feasible for small and medium business owners either because of limited time/staff or because corporate headquarters must review and approve rather than allowing a local office or branch to modify. Include financial reasons for incorporating these changes; projected financial savings or anticipated rebates or incentives should be included.
6. Funding should be allocated to local governments to develop tools, documents, etc. that will assist tenants and non-headquarters/corporate offices to pursue energy efficiency projects; often times local managers will not pursue programs/financing/projects if 'corporate' permission is required.
7. Energy Performance Districts will assist local governments to make meaningful change. The roles of investor owned utilities and community choice aggregators should be clearly outlined as part of developing District guidelines to ensure each have separate, yet meaningful roles and to limit customer confusion.
8. Business license renewal can be used as 'trigger' for submitting separate energy audits/assessments but local governments can also leverage other locally-specific opportunities to engage businesses, e.g. Chamber of Commerce meetings, green business programs, etc. Local governments need funding to support businesses to complete assessments and report energy use otherwise the requirement could result businesses not renewing businesses licenses; there should be easy to understand resources for business owners, e.g. central web portal to understand requirements and how to meet them. Funding for additional staff time and coordination with the City's Finance Department may be needed to incorporate this additional requirement upon renewal of business licenses.
9. Identify funding that would allow for post-installation measurement of energy savings and on-going tracking; third party lighting program providers generate savings based on deemed savings, but real-life savings often vary due to operation or behavior changes. Some businesses have multiple meters. Efficiency upgrades should be tied to specific meters so that post-installation savings are accurately reflected.

10. The Local Government Energy Challenge will empower local governments. Funding should be directed to:

- Existing and successful programs already being implemented by local governments.
- Additional City staff support to make necessary code changes that include comprehensive community outreach campaigns.
- Efficiency projects tied to natural gas use that achieve deeper energy savings than lighting, e.g. combined heat and power. For example, Benicia needs help identifying potential CHP sites, facilitating communication with property owners, and funding these high-cost projects that tend to have longer pay back periods.
- Funding needed to upgrade internal city financial and billing system to allow for implementation of programs like PAYS.
- Funding should be allocated to communities that can show reductions are directly related to Climate Action Plan strategies and reduction goals.

11. Energy Performance Districts can assist local governments to better identify energy reduction opportunities. However, Benicia already understands where high energy use areas are located, but needs to drill down to the building level to make meaningful energy efficiency upgrades. Without building level data, local governments may expend resources on those buildings with limited savings opportunities while it could be focusing on high savings opportunities.

The above comments are some of the key issues the City believes should be considered as the Commission receives input from many other key stakeholders and moves forward with the development of the Action Plan and eventual implementation of policies and programs. Benicia looks forward to being actively engaged in this process.

Sincerely,

Alex Porteshawver, JD, MELP
Consulting Climate Action Plan Coordinator

Cc: Christina Ratcliffe, AICP, Community Development Director