

## DOCKETED

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## **Santa Barbara County Local Government Challenge Comments**

Thank you for your consideration of the attached comments.

Angie Hacker

Manager, emPower Central Coast

County of Santa Barbara

*Additional submitted attachment is included below.*

**County of Santa Barbara emPower Central Coast Comments regarding  
the Local Government Challenge in the Draft Existing Buildings Energy Efficiency Action Plan**

**Docket Number 15-IEPR-05**

**May 21, 2015**

The County of Santa Barbara's emPower Central Coast program (emPower) appreciates the opportunity to comment on the Local Government Challenge contemplated in the March 2015 draft of the California Energy Commission's (CEC) *Existing Buildings Energy Efficiency Action Plan*. emPower participated in the May 7<sup>th</sup> workshop and appreciates the CEC's commitment to providing a new and lasting source of resources to support and enable local government energy initiatives to be developed and thrive. emPower is encouraged by the opportunity for the State and local governments to collaborate more directly and broadly to develop programs that can effectively accelerate the transition to energy efficiency in existing buildings.

emPower is Santa Barbara County's innovative clean energy and building efficiency program. Established in 2011, emPower was originally charged by the County of Santa Barbara to help consumers overcome obstacles to lowering energy consumption and now serves the region in partnership with Ventura County and San Luis Obispo Counties. By making market solutions accessible and economically viable, the program aims to *empower* consumers and professionals to make clean, efficient and effective energy decisions. emPower leverages valuable partnerships with funding agencies, cities, lenders, contractors, utility programs, non-profits, training organizations and realtors across the region.

**Recommendations for the Local Government Challenge**

emPower respectfully recommends that, to the extent possible, the funding available through the Local Government Challenge:

- Be long term, consistent and predictable
- Be a larger sum than \$20M annually
- Be allocated on a competitive basis
- Allow substantial time to develop relationships and proposals in advance of the submission date
- To the extent possible, avoid compliance requirements that significantly limit participation and make on-the-ground program delivery challenging (i.e. SHPO)
- Encourage all energy improvements, not just those that go above and beyond code
- Include criteria to encourage regional and multi-jurisdictional collaboration and service delivery, but do not limit regional interpretation to PUC recognized RENS
- Include criteria to recognize local governments that have demonstrated capacity and already have "shovel ready" energy program infrastructure
- Enable any local government to target their highest users, and avoid placing coastal geographies with lower overall energy load at a disadvantage

- Allow for renewable and water efficiency efforts where appropriate since consumers often consider these improvements in tandem
- Not be limited in scope to those activities that local governments can govern through building codes
- Encourage programs that can collaboratively engage schools, agriculture and water purveyors
- Consider whether development of Community Choice Aggregation programs can be made eligible
- Allow local programs the flexibility to realize their strategic role in tying together disaggregated market players within a region to deliver greater value and convenience for consumers. This could entail support for internal program delivery capacity such as staffing, training and IT.
- Make eligible the following types of activities (please see the next section for an example of how such activities can be part of a comprehensive service framework):
  - Code compliance
  - Strategic regional energy performance planning
  - Voluntary, market based residential, commercial, and municipal energy upgrade programs including:
    - Financing (credit enhancements and local lender engagement)
    - Incentives and incentive promotion
    - Direct install
    - Bulk purchasing
    - Energy advising
    - Scoring, labeling and certifying
    - Workforce development and contractor engagement
    - Targeted outreach
    - Consumer qualification, referral, support
    - Energy action data tracking, aggregation, analysis and reporting
    - Plug-in load and DIY assistance
    - Auditing, benchmarking and technical assistance

### **Example of “Whole Community Approach” to Local Energy Service Delivery that Aligns with AB 758 Strategies**

At the May 8<sup>th</sup> workshop, Commissioner McAllister asked local governments in their comments to include innovative ideas that can help the CEC understand how the Local Government Challenge can best help local governments achieve shared energy goals. Santa Barbara County recently conducted a thorough analysis of the Action Plan, along with an extensive review of state and national best practices and local needs. This effort was part of emPower’s recent effort to identify the best approach to further accelerate the region’s transition to sustainable energy and to most effectively utilize current and future funding. This comprehensive approach, described as the “Whole Community Approach” is outlined in a draft concept paper<sup>1</sup> that can be found at: [http://www.empowersbc.org/sites/empowersbc.org/files/Whole%20Community%20Approach%20Framework%200\\_052115.pdf](http://www.empowersbc.org/sites/empowersbc.org/files/Whole%20Community%20Approach%20Framework%200_052115.pdf)

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<sup>1</sup> The concept paper is a preliminary draft and is provided as an example of local potential. Santa Barbara County is still in the process of gathering input from our communities, partners and decision makers. Concepts and activities in this paper are subject to change. The concepts herein does not formally represent the requests or intents of Santa Barbara, Ventura or San Luis Obispo Counties.

The concept paper outlines a potential local energy service delivery framework that is capable of “rightsizing” sustainable energy solutions for various types of local energy users, and targeting services according to need, use and interest. It includes specific strategies that emPower is already administering or is positioned to administer in partnership with organizations within the region. These strategies are associated with corresponding Action Plan strategies, illustrating the close alignment with the goals of the Action Plan. The intent of including it along with these comments was to provide an example of how a locally administered program has the capacity to play a strategic and comprehensive role in tying together disaggregated market players within a region to deliver on-the-ground value and convenience for consumers, while also offering important outcomes and data for State and local decision makers. It is hoped that the CEC would consider the elements of such a service model to be effective strategies under the Local Government Challenge.

The paper highlights the region’s aggressive commitment to pursuing consumer energy savings. In fact, on May 19, 2015, the Santa Barbara County Board of Supervisors adopted its Energy and Climate Action Plan (ECAP), which sets significant targets for kWh, therm and emission savings in residential and commercial buildings. The ECAP calls for major energy improvements in over 7,000 homes and 320 businesses by 2020. Ventura and San Luis Obispo Counties also have climate action plans and targets for their communities.

#### **Clarification regarding ARRA and Ratepayer Pilots**

Finally, while not listed on the CEC’s ARRA Pilot webpage, and not asked to present at the Local Government Challenge forum, Santa Barbara County would like to request to be recognized as one of the State’s ARRA pilots. The County of Santa Barbara has received three sources of ARRA funding to support its emPower program. In 2010, emPower was awarded Energy Efficiency and Conservation Block Grant formula funding from CEC, as well as competitive funding from the US Department of Energy BetterBuildings program. In 2013, emPower received CEC State Energy Program funding as a subrecipient of Los Angeles County’s award.

In addition, the emPower program has received ratepayer dollars since 2012, but was not including in the presentation by the Public Utilities Commission on local government programs. Because emPower was funded by a special ARRA Continuation line item directed by the PUC, emPower is not recognized as a Local Government Partnership program, nor a Regional Energy Network, however it shares characteristics with both. In fact, through its partnership with Ventura and San Luis Obispo Counties, emPower delivers 12 energy services to the 1.4 million people of Tri-County area. These services include one of the first credit enhancement-backed, residential home upgrade financing partnerships with lenders in the State, one of the first residential energy advisor programs, and innovative approaches to local outreach and contractor engagement.

Given its unique business model, emPower is concerned that omission from these discussions means that the Central Coast’s history of developing leading efficiency efforts may be overlooked during key State proceedings on energy efficiency. emPower strives to continue to be an active partner with the State to continue delivering a growing suit of energy services to the region.