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Water Appliance Rebate Comments

Additional submitted attachment is included below.

BEFORE THE CALIFORNIA ENERGY COMMISSION

COMMENTS OF

StopWaste: Energy Council

ON

Water Appliance Rebate program (15-WATER-03)

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For **StopWaste: Energy Council**

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Introduction

StopWaste: Energy Council is pleased to provide these comments in response to the question posed during the May 28th 2015 webinar on the California Energy Commission's ("CEC") *Water Appliance Rebate Program*. The Energy Council is a public Joint Powers Authority created in 2013 by the County of Alameda and 12 cities in the county to assist them with developing and implementing programs and policies that reduce energy demand, increase energy efficiency, advance the use of clean, efficient and renewable resources, and help create climate resilient communities. The Energy Council's initiatives are carried out by StopWaste, a public agency whose staff and programmatic work are governed by the Alameda County Waste Management Authority (established in 1976) and the Alameda County Source Reduction and Recycling Board (established in 1990). The Energy Council's activities are an extension of StopWaste's pioneering work over more than two decades helping local governments, businesses, schools and residents solve critical waste, water, energy and climate issues. Since the 1990s our green building team has been working with our member jurisdictions and the building industry to develop programs, policies and tools that can, and have been, replicated and scaled throughout the state.

Multifamily Comments

Most recently, we have been administering the rate-payer funded Bay Area Multifamily Building Enhancement's (BAMBE) program in partnership with the Bay Area Regional Energy Network and our implementation consultants. BAMBE offers a flat per-unit incentive for property owners to undertake a bundle of multiple measures at one time, targeting a minimum percentage of energy savings on a whole building basis. This experience has afforded us valuable contact with many multifamily projects – BAMBE has installed and verified energy upgrades in over 8,000 dwelling units representing a diversity of segments in the sector.–

We share the following insights into what program designs features appeal to multifamily property owners Multifamily property owners **generally**:

- prefer to participate in a single program that can serve multiple measures rather than multiple individual measure incentive programs
- prefer having one program that they can apply across a portfolio of properties rather than different programs depending on their local utility
- want flexibility in choosing equipment and products that work for their specific properties
- prefer choosing and managing their own contractors over direct install program models

With these observations in mind, we support the CEC's stated intention to leverage existing rebate programs and layer the new water appliance rebates onto existing programs. This is both efficient for program administration and customer participation.

We encourage the CEC to maximize the benefits of layering by allowing existing multifamily whole building rebate administrators to serve as pass-through entities for the new water appliance rebates. Specifically, allow existing administrators to: 1) Receive rebate funds from CEC on behalf of the projects, 2) Pay the rebate to the projects, as two separate payments or a single payment combined with the existing energy rebate, and 3) Provide verification and QA reports to the CEC.

Adding this capacity to existing administrators would provide the following benefits:

- Streamlined experience for customers. This is a critical component to program uptake and customer satisfaction, as documented in the MF HERCC report¹. The property owner feedback has consistently been to combine rebate programs to eliminate multiple applications and site visits. The proposed approach would allow a customer to deal with one application, one set of site visits with one entity, and receive a single payment.
- Reduced program administration costs shared collectively between programs, by leveraging outreach and QA.
- Provides the new water appliance rebate program access to an existing pipeline of projects, and benefit from auditors already engaging property owners and entering dwelling units to assess the energy and water saving opportunities.
- Encourage property owners to look at installing multiple water saving appliances at one point of intervention, compared to individual appliance rebates.

We also encourage the CEC to consider issuing incentives for as comprehensive of a set of water savings measures as possible to maximize the opportunity to match a water saving appliance to each unique property situation.

We look forward to providing more detailed comment on the CEC's Water Appliance Rebate program once the draft guidelines are developed.

¹ [Multifamily Home Energy Retrofit Coordinating Committee \(MF HERCC\) 2015 Update to Program Design Recommendations](#) report. See page 25 for water-energy recommendations.

Respectfully submitted,

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For

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