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Additional Strategy 2.2 Updates

To: California Energy Commission

From: REV® formerly True Market Solutions

Subject: Public Comments Regarding the Draft Update to the Existing Building Energy Efficiency Action Plan

Docket 16-EBP-01

Date: November 1, 2016

Thank you for the draft updates (Draft Update) to the Existing Building Energy Efficiency Action Plan (EBEEAP). REV applauds the 2015 EBEEAP plan that remains in effect as well as the many excellent additions in the proposed Draft Update.

As to comments REV now submits, the first is to recommend addressing a minor omission in the Table of Contents. We propose that "Strategy Section 2.2" be added to the Table of Contents. In the present version of the Draft Update, the section should be listed to begin on page 41.

More importantly, our main comments we submit here are to encourage adding important content to section 2.2 updates. As was well documented on page 69 of the EBEEAP last year, REV's peer cohort trainings in concert with IOUs and otherwise have and continue to produce outstanding energy efficiency and other sustainability outcomes. REV alone has served over 400 organizations using the peer cohort method and, upon request, we are prepared to share best practices learned, summary data and case studies to more fully inform the Draft Update.

For example, just recently in partnership with SDG&E, REV launched successful small business Sustainability Circles® enabling over 30 small and medium size businesses at no cost to join our peer cohorts so each can affordably figure out the benefits of applying energy efficiency and other sustainability tools and tactics right away. In this case, these peer cohort trainings were entirely funded by SDG&E. Our trainings, conducted in a peer setting, are led by coaches who help participants more effectively craft energy efficiency and sustainability plans that also benefit from the insights and support of other peer organizations in the cohort. More than that, the curriculum explicitly anticipates and addresses behavioral hurdles within participating organizations that might hinder rapid application of cost saving efficiencies and innovations. We submit that the Draft Update should encourage the IOUs and policy makers to carry out the intent of AB 793 and other energy efficiency mandates and incentives by fully funding and supporting peer cohort trainings at scale. Further, we recommend that the Draft Update encourage research and development to further prove their efficacy.

The Draft Update should also report that peer cohort trainings can be applied far beyond IOU programs. For example, REV recently became partners with the non-profit Institute of Local Governments to help California municipalities join and attain the BEACON voluntary standard for sustainability in their jurisdictions. Over 100 California cities have adopted the BEACON program, a standard that not only applies energy efficiency and sustainability tactics in municipal operations but also guides its participating cities to help its businesses and other organizations within the city limits do the same.

We are in the process of bringing peer cohort trainings to other network leaders, for-profit and non-profit associations and entities, to help their members and stakeholders realize the benefits of applied energy efficiency and sustainability, sooner, affordably and using the best of sustainability and behavioral science. Presently we are conducting peer cohort trainings for airports, school districts, and corporations of all sizes. From Pixar and Oracle to

small and medium sized manufacturers, each organization has a web of employees, suppliers, stakeholders and communities that need to be engaged in a directed manner; a manner that empowers each to apply best practices right away and more effectively. Peer cohort trainings are proving to be a promising “engagement process technology” that can deliver important and measurable energy efficiency and sustainability outcomes to benefit the public good. As such the Draft Update should reflect the emergence of these promising tactics.

We also submit that the Draft Update should explicitly reference the use of peer cohort trainings for applied energy efficiency as an affordable, practical and scalable tactic to deliver energy efficiency to disadvantaged communities. Of the 400 customer organizations REV has coached over the last few years, we compared the zip codes of those organizations to the disadvantaged communities zip codes referred to in SB 350 and discovered that approximately one fourth of REV’s customer organizations come from those disadvantaged communities.

Finally, we recommend that the Draft Update also reference the importance of peer cohort trainings as it relates to workforce training. Because our peer cohort trainings sometimes include both businesses and educational institutions such as school districts and colleges, these organizations are able to work together, often for the first time, to help each other build energy efficiency and sustainability action plans. The result of these collaborations in a facilitated setting, anecdotal so far, has great potential to reveal the energy efficiency and sustainability jobs that exist and can be created with smarter analysis and planning; jobs that our workforce community can help to reveal and prepare our students to perform in concert with the private sector.

Thank you,
Matt Bogoshian
Chief Strategy Officer and General Counsel
REV