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Comment Received From: Jennifer BErg

Submitted On: 8/24/2016

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BayREN Comments - : SB 350 Barriers Study and Inclusive Financing for Distributed Energy Solutions

Additional submitted attachment is included below.



“Bay Area communities working together for a sustainable energy future.”

August 24, 2016

California Energy Commission
Dockets Office, MS-4, Re: Docket No. 16-OIR-02
1516 Ninth Street
Sacramento, CA 95814

RE: SB 350 Barriers Study and Inclusive Financing for Distributed Energy Solutions

CEC Staff,

The Bay Area Regional Energy Network (BayREN) program portfolio includes partnerships with several municipal water utilities to install customer water and energy efficiency improvements through the Pay As You Save (PAYS®) On-Bill Tariff approach.

We urge the Commission to consider PAYS as a tool to unlock distributed resource solutions for *all* utility customers in California, including low and moderate income customers, renters, and property owners.

PAYS allows utilities to invest in upgrades to customer properties and to recover the cost of those improvements through a tariff. Customers that voluntarily participate receive immediate net savings on their bill and take on no new debt obligation. They simply continue to pay their, now lower, utility bill. This approach acknowledges that utility infrastructure extends behind the meter and that utilities can harness the investment opportunity in customer-side infrastructure in a way that benefits *any utility customer, regardless of income or housing ownership*.

You can read more about the BayREN PAYS programs here: <https://www.bayren.org/pays>. Examples of PAYS success in other states can be found here: <http://cleanenergyworks.org/>. The attached PDF also explains the fundamental elements of the PAYS tariff model that set it apart from rebate and debt-based models for customer upgrades.

We look forward to the chance to discuss our experience with PAYS and the role that it can play in achieving the goals of SB 350. I can be reached at jennyb@abag.ca.gov or (415) 820-7947, and I would be happy to coordinate any communications between our BayREN team and CEC staff.

Sincerely,

Jennifer K. Berg
Senior Program Manager, BayREN