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Comments to CEC's SB 350 Barriers Study Report

Please see the attached comment letter from the El Dorado County Water Agency.

Additional submitted attachment is included below.



El Dorado County Water Agency

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September 28, 2016

Alana Mathews
California Energy Commission
1516 Ninth Street, MS-29
Sacramento, CA 95814-5512

Subject: SB 350 Barriers Study Draft Report - Barriers of Low-Income and Disadvantaged Communities to Renewable Energy and Energy Efficiency

Dear California Energy Commission,

Please accept this comment letter from the El Dorado County Water Agency (EDCWA) on the California Energy Commission's SB 350 Barriers Study Draft Staff Report. The EDCWA develops countywide water planning and advocates for the water interests of El Dorado County. Given the nexus of water and energy usage, EDCWA is invested in promoting energy efficiency and renewable energy opportunities, such as those proposed in SB 350.

EDCWA appreciates this opportunity to comment on the barriers to implementing SB 350 and potential solutions to these barriers. The El Dorado region of the Sierra Nevada is a unique area in California that spans rural towns and popular lake and mountain resort communities, many of which qualify as low-income and economically disadvantaged. SB 350 has the potential to significantly impact El Dorado County residents and commercial businesses in energy efficiency and renewables adoption.

Identifying Low-Income Communities

EDCWA is in support of SB 350 not mandating low income communities meet the CalEnviroScreen designation for disadvantaged communities. Many rural communities in the Sierras no longer qualify under CalEnviroScreen's version 2.0 as a disadvantaged community, despite current economic struggles. Much of the El Dorado County region is economically isolated and disadvantaged, with unemployment rates that have remained higher than state averages and incomes across the region in decline since 2010. In 2014, 60.4% of students in the Lake Tahoe Unified School District participated in the free and reduced school lunch program.

As such, EDCWA recommends that SB 350 not use CalEnviroScreen as a measure for low-income criteria, as this will result in the exclusion of economically disadvantaged rural communities in the Sierra Nevada. To identify low-income communities for program eligibility, EDCWA uses the California Department of Housing and Community Development's income guidelines and suggests the CEC reference these guidelines for SB 350 implementation.

Defining Population Requirements

Rural communities in the Sierra Nevada also serve as popular visitor destinations, often exploding in population during peak seasonal periods. EDCWA advises that SB 350 base any population requirements on both visitor and permanent population estimates, to more accurately account for resort communities, like Tahoe.

Tahoe must be able to support a significant influx of peak seasonal visitors, during both the summer and winter periods, with up to 3 million visitors each year, and 300,000 visitors on peak days, a tremendous increase from an estimated year-round resident population of 50,000. The visitor population equates to higher demands on the

electrical grid, loads that resort communities must have the capacity to support during seasonal fluctuations, but also opportunities for notable impacts on energy efficiency savings. There is an inequitable burden placed on rural, resort local populations to construct and maintain public works infrastructure services for the visitor population. As renewable energy and energy efficiency will help mitigate the added energy burdens of these visitors, their population impacts should be accounted for.

Additionally, performance or cost effectiveness criteria are often based off of urban areas, which may not adequately apply to rural areas. Rural communities can be at a disadvantage if they are compared against urban area baselines, due to differences in population density. EDCWA suggests that SB 350 cost effectiveness tests pull from data from both rural and urban communities.

Applicable Renewable Energy Technologies

EDCWA recommends that the SB 350 Barriers Study include forest biomass opportunities to benefit both energy production, as well as fire threat reduction. California's drought ravaged forests are at tremendous risk of catastrophic wildfire. El Dorado County is a heavily forested area, as such wildfire forest management practices are critical to the sustainability of our region. Without a healthy forest, our region cannot sustain a healthy watershed, and as a result will not provide a healthy water supply. Water from El Dorado affects not just our region, but much of California which receives water from the Sierra Nevada snowpack. As we face our fifth year of drought, we recognize the untapped potential of using forest biomass as a renewable energy.

EDCWA additionally advises the inclusion of other renewable technologies, beyond solar, that could be applied in the El Dorado region, including wind, combined heat and power (CHP), and in-conduit hydro. Under Appendix B: Summary of Responses from the Community Meetings: Question 3 regarding existing solar panels in the community, N/A was noted for the Tahoe/Sierra Mountain Region. However, there are homes with solar energy generation systems in Tahoe and El Dorado County. The region has quite a few companies that provide roof and ground mounted solar energy solutions, as well as wind, CHP, and hydro energy systems, for residential and commercial customers.

Funding Needs

To help showcase the effectiveness and success of energy efficient and renewable technologies, EDCWA recommends providing funding for demonstration projects, especially for rural, mountainous environments. El Dorado County offers some of the most challenging terrain and weather in California, with high elevation, cold winter temperatures and snowy conditions. This demanding environment sparks the need for education and outreach on the performance of renewables and energy efficiency measures, which can often be best demonstrated through successful pilot programs.

Rural Area Utility Energy Programs

EDCWA would also like to encourage a more equitable balance in energy efficiency and renewable energy program investment for smaller utility service providers that serve the rural communities of California. Liberty Utilities, which services the Tahoe region, does not offer the same range of energy efficiency and renewable rebate, incentive, grants, loans and financial options that is offered by the larger investor owned utilities, like Pacific Gas and Electric. This includes programs like the California Solar Initiative, and the Single and Multifamily Affordable Solar Homes Programs. As a result, Tahoe Basin residents are at a financial disadvantage, compared to regions that are served by the major utilities, as they do not have access to the same opportunities to invest in renewables and energy efficiency.

Thank you for considering our comments and for the opportunity to submit recommendations to the CEC on the SB 350 Barriers Study. We hope that implementation of SB 350 will take into account the needs of California's rural, mountainous communities.

Sincerely,



Ken Payne, P.E.

Interim General Manager