

DOCKETED

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Sierra CAMP Comment Letter on SB 350 Barriers Study

Additional submitted attachment is included below.



September 29, 2016

California Energy Commission

RE: Draft Report - A Study of Barriers and Solutions to Energy Efficiency, Renewables and Contracting Opportunities Among Low-Income Customer and Disadvantaged Communities

Dear California Energy Commission:

The Sierra Climate Adaptation and Mitigation Partnership (Sierra CAMP) is a public-private, cross-sectoral partnership dedicated to promoting climate action and resilience in the Sierra Nevada region. Sierra CAMP is a member of the Alliance of Regional Collaboratives for Climate Adaptation (ARCCA), which is supported by the Governor's Office of Planning and Research, and is hosted as a project of the Sierra Business Council.

Sierra CAMP is pleased to provide comments on the draft report *A Study of Barriers to Energy Efficiency, Renewables and Contracting Opportunities Among Low-Income Customer and Disadvantaged Communities*, dated September 9, 2016. We appreciate many of the points addressed in this draft report, especially the lengthy conversation on the barriers renters and multifamily property owners face in accessing renewable energy sources. Furthermore, we also appreciate the discussion (page 100, lines 3-8) of challenges like older building stock and tree coverage which limit rooftop solar installations in forested areas. The draft report's discussion of issues specific to Native American communities (page 25, lines 11-27) is also encouraging and important to several communities within the Sierra Nevada Region.

Sierra CAMP offers the following comments and questions to help strengthen and clarify portions of the draft strategy:

Aiming for Comprehensive Savings and Offering a Range of Measures (page 46, lines 5-14): suggest broadening discussion on the range of utilities that may overlap in the energy efficiency realm to include a greater emphasis on propane. Many rural areas of the state, particularly the Sierra Nevada region, rely on propane for heating. Unfortunately, restrictions on many rebate and assistance programs exclude residents who use this source of energy.

Disadvantaged Community Definition (page 43, lines 3-9 and page 73, lines 4-7): expand the disadvantaged communities recognized by the program to go beyond those defined by CalEnviroScreen. CalEnviroScreen 2.0 focuses primarily on urban areas through an emphasis on pollutants and other criteria that are not measured or do not occur in rural communities. This tool precludes virtually all disadvantaged people in the Sierra Nevada. We suggest incorporating the criteria defining disadvantaged communities as used by the Department of Water Resources, which measures disadvantaged communities by those with a median income less than 80% of the statewide average, or a similar measurement tool.

Rural Concerns: expand on the consideration of issues unique to rural areas of the state. The section highlighting "Challenges Unique to Native American Communities" touches on several issues that broadly affect rural areas, beyond just Native American communities. The draft report overlooks issues such as

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difficulty in attracting projects and contractors to rural areas because of their low population density and scope.

Touching on Other Renewables: consider other forms of renewable energy, such as biomass power, as an opportunity to bring broad renewable energy sources to low-income customers. The draft report emphasizes solar energy throughout the document, though it is important to note that many factors including building age or tree coverage limit the effectiveness of solar energy. Invigorating biomass as a renewable energy source would be particularly effective in the Sierra Nevada.

Thank you for your important work on coordinating the management of freshwater resources across the country. We look forward to continued engagement as the process unfolds.

All best,



Karen Ferrell-Ingram, Land Conservation Specialist

Rosemarie Smallcombe, Mariposa County Supervisor

Scott Warner, Hydrogeologist