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Energie comments on Low-Income Barriers Study Draft Staff Recommendations

Additional submitted attachment is included below.



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Enervee Comments on SB 350 Low-Income Barriers Study Draft Staff Recommendations

Enervee shares the energy equity aspirations of SB 350 and appreciates the opportunity to comment on the draft staff recommendations on the SB 350 Low-Income Barriers Study.

The recommendations take up key themes and suggestions from the barriers study and stakeholder input that will help ensure that low-income and disadvantaged populations have access to the most efficient consumer products and can live in comfortable, healthy and efficient buildings. We note, in particular, that the Commission has addressed the three key issues that Enervee raised in prior comments on the barriers study itself, namely:

- Importance of data to inform program intervention strategies (including targeting) and improve program delivery, under recommendation 5;
- Consideration of plug load & appliance (PLA) efficiency barriers and solutions, under recommendation 5(e);
- An enhanced customer focus, including consideration of customer-related non-energy benefits and empowering customers to manage their energy, for example, under recommendations 2(b) and 5(e).


With respect to specific recommendations made by the Commission, we would like to share several suggestions:

- Include efficiency in a CleanCARE pilot program (recommendation 2b): We support the proposal to give households choice in how they use CARE subsidies, recognizing that subsidizing energy bills does not address root causes and sends the wrong price signals. However, development of a CleanCARE pilot or similar program design should consider monthly energy bill impacts and a broader array of potential uses for CARE subsidies, in particular, the purchase of energy and water efficient consumer products (outside of direct install programs) that would result in lower utility bills. Establishing a (digital) coupon system and leveraging product efficiency marketplaces would offer a simple and engaging delivery mechanism. Efficient product marketplaces were highlighted as a key market transformation effort in the Commission's draft

update to the Existing Buildings Energy Efficiency Action Plan¹ and can support low-income initiatives. Use of CARE subsidies to enable low-income households to invest in more efficient plug load purchases than they otherwise would have would lead to a sustained reduction in energy bills over the product lifetime.

- Take a customer-centric approach and pilot new program intervention strategies. The notion in recommendation 5e that data can and should be used to empower low-income customers to select efficient consumer products is an important new strategy that can improve the scale, performance and benefits of low-income programs to participants and society as whole. In addition, we urge the Commission to ensure an enhanced customer focus and encourage experimentation with behavioral interventions across low income program offerings. This should lead to a better user experience, improve participation and expand the scope of low-income programs beyond direct install to fast growing electronics categories and interventions that influence low-income shopping decisions without large subsidies. Direct install programs could also become more user friendly by giving customers more choice & control (e.g., online product selection by customers).
- Capitalize on the locational value of energy savings and demand reductions in grid-stressed areas and the ability to target low-income customers to support higher incentives for super-efficient consumer products (e.g., room AC), so that direct install is not the only option to deliver low-income programs. The use of data to better target programs was raised in various contexts, such as targeting participants, program services or to identify the right intervention strategies; this is one specific area where pilot programs might be encouraged.

Sincerely,



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About Enervee

Founded in California in 2011, Enervee has built a global data & SaaS platform that analyzes consumer product markets in real time and provides online marketplaces that engage customers, activate clean energy markets and drive energy savings. We currently operate marketplaces serving roughly 12% of all US households, on behalf of leading public and private utilities, including [LADWP](#), [PG&E](#) and [SDG&E](#) in California.

¹ <https://efiling.energy.ca.gov/getdocument.aspx?tn=213983>