

## DOCKETED

<b>Docket Number:</b>	16-OIR-02
<b>Project Title:</b>	SB 350 Barriers Report
<b>TN #:</b>	214715
<b>Document Title:</b>	California Municipal Utilities Association Comments: on Low-Income Barriers Study
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	California Municipal Utilities Association
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	12/8/2016 4:46:47 PM
<b>Docketed Date:</b>	12/8/2016

*Comment Received From: California Municipal Utilities Association*

*Submitted On: 12/8/2016*

*Docket Number: 16-OIR-02*

**on Low-Income Barriers Study**

*Additional submitted attachment is included below.*

**BEFORE THE CALIFORNIA ENERGY COMMISSION**

**In the Matter of:**

*Senate Bill 350 Study on Barriers to Low  
Income Customers to Renewable Technologies  
and Energy Efficiency Investment*

**Docket No. 16-OIR-02**

**RE: Senate Bill 350 Barriers Study**

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**CALIFORNIA MUNICIPAL UTILITIES ASSOCIATION COMMENTS  
ON THE LOW-INCOME BARRIERS STUDY**

The California Municipal Utilities Association (“CMUA”) appreciates the opportunity to provide these comments to the California Energy Commission (“Commission”) on the *Draft Staff Report, Low-Income Barriers Study, Part A: Overcoming Barriers to Energy Efficiency and Renewables for Low-income Customers and Small Business Contracting Opportunities in Disadvantaged Communities* (“Barriers Study”), issued on December 1, 2016. CMUA supports the Commission’s goal to better understand and reduce barriers to low-income customers accessing energy efficiency and renewable energy. Increasing low income customer access to these resources can serve as a valuable tool in helping to meet the state’s environmental goals.

On October 28, 2016, CMUA filed comments raising significant concerns with the *SB 350 Low-Income Barriers Study Draft Recommendations*.<sup>1</sup> Several of the draft recommendations included legislative mandates for new utility programs, but did not incorporate the need for local discretion and flexibility in program design for the governing boards of publicly owned electric utilities (“POUs”). As CMUA stated in its prior comments, recommendations for new mandates must be carefully and thoroughly considered because new mandates remove the ability of the POU to design programs for its local community, and force limited program funding away from existing

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<sup>1</sup> See California Municipal Utilities Association Comments on SB 350 Low-Income Barriers Study Draft Recommendations, October 28, 2016.

programs. The revised recommendations in the Barriers Study are significantly improved and appropriately recognize the role that the POU governing board must play in implementing customer programs, particularly those intended to benefit low-income customers. CMUA appreciates the willingness of Commission staff to respond to the concerns of the POUs.

In the Barriers Study, Principle Recommendation 4 states that the Commission “should encourage and help implement a tariffed on-bill program among POUs and rural electric cooperatives.”<sup>2</sup> Maintaining control over rates and rate design is a core value for POUs and their locally-elected and appointed officials, and CMUA would strongly object to any recommendations that would limit or restrict the authority of the POU governing boards in this respect. CMUA supports Principle Recommendation 4 to the extent that the Commission’s intent is to provide support in developing best practices, offering technical assistance, or other similar voluntary and mutually beneficial activities. Similar to other proposals in the Barriers Study, on-bill financing may be an effective and appropriate tool for some POUs, while others may determine that different options will be more cost effective, feasible, or successful in their service territory. The authority to make that determination must remain with the POU governing boards.

CMUA appreciates the opportunity to provide these comments to the Commission.

December 8, 2016

Respectfully submitted,



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<sup>2</sup> Barriers Study at 7.