

## DOCKETED

<b>Docket Number:</b>	17-IEPR-06
<b>Project Title:</b>	Doubling Energy Efficiency Savings
<b>TN #:</b>	216049
<b>Document Title:</b>	C.A.R. Comments on CEC Staff Paper re SB 350 Framework
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	California Association of Realtors
<b>Submitter Role:</b>	Other Interested Person
<b>Submission Date:</b>	2/15/2017 2:53:20 PM
<b>Docketed Date:</b>	2/15/2017

*Comment Received From: Jeli Gavric*

*Submitted On: 2/15/2017*

*Docket Number: 17-IEPR-06*

**C.A.R. Comments on CEC Staff Paper re SB 350 Framework**

*Additional submitted attachment is included below.*



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CALIFORNIA ASSOCIATION OF REALTORS®

February 15, 2017

California Energy Commission  
Dockets Office, MS-4  
Re: Docket No. 17-IEPR-06  
1516 Ninth Street  
Sacramento, CA 95814

**Re: *Framework for Establishing the Senate Bill 350 Energy Efficiency Savings Doubling Targets***

Dear Commissioner Weisenmiller,

Thank you for the opportunity to provide comments on the *Framework for Establishing the Senate Bill 350 Energy Efficiency Savings Doubling Targets*. The CALIFORNIA ASSOCIATION OF REALTORS® (C.A.R.) seeks to continue to be a valuable contributor in the development of regulations and policies related to improving energy efficiency in existing homes. Our comments below reflect concerns with proposed programs in the section entitled *Staff Proposal on Subtargets, Cost-Effectiveness, Feasibility and Reliability*.

Our first comment is regarding the recommendation that energy audits be performed at “time of sale”. In the passage of both AB 758 (Skinner, 2009) and SB 407 (Padilla, 2009), the California Legislature recognized that time of sale mandates do not effectively meet California’s energy and water use efficiency goals in a timely manner. Therefore, time of sale mandates were deliberately left out of both pieces of legislation. With housing turnover occurring every 22 years, time of sale mandates fail to ensure comprehensive, region-wide results. Furthermore, homeowners and occupants should be aware of their energy efficiency status and the potential for increased savings and comfort while they are living in a home and not upon vacating. To reach the goals of SB 350, energy efficiency audits should be encouraged for all homes with a meaningful target date for compliance.

Our second comment is that California already requires benchmarking for commercial buildings. As you know, the transaction-based Nonresidential Building Energy Use Disclosure Program under AB 1103 (Saldana, 2007) was abandoned in 2015 in favor of the statewide benchmarking program mandated by AB 802 (Williams, 2015). Data collected under the AB 802 program will give the Commission and stakeholders the information needed to improve implementation strategies and pursue more aggressive programs.

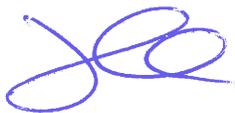
Our third comment is in regard to subtargets for Property Assessed Clean Energy (PACE) financing programs, C.A.R. recommends that PACE fees and debt obligations be factored into any cost benefit analysis.

Our fourth comment is regarding all cost benefit analyses. We ask that only verified savings and benefits be used in your calculations. C.A.R. is concerned that green features of a home may be aspirationally valued,

especially if features are not properly installed. As a Commissioner and other stakeholders noted in the AB 758 Action Plan Update proceedings, it is estimated that over half of all energy efficient installation and retrofits are installed incorrectly or are underperforming. C.A.R. believes that if energy efficiency programs are truly working, then participants will see results directly on their energy bills, which could be verified by benchmarking and utility data.

We look forward to an ongoing collaboration with the California Energy Commission in its efforts to establish annual targets for energy efficiency savings and appreciate the opportunity to provide comments to help achieve a doubling of statewide energy efficiency savings by 2030.

Sincerely,

A handwritten signature in blue ink, consisting of several loops and a long horizontal stroke, positioned below the word "Sincerely,".

Jeli Gavric  
Legislative Advocate