

## DOCKETED

<b>Docket Number:</b>	17-IEPR-06
<b>Project Title:</b>	Doubling Energy Efficiency Savings
<b>TN #:</b>	216059
<b>Document Title:</b>	ZYD Energy Comments on SB 350 Doubling Energy Efficiency Savings
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	ZYD Energy, Inc.
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	2/15/2017 4:57:51 PM
<b>Docketed Date:</b>	2/15/2017

*Comment Received From: YANDA ZHANG*

*Submitted On: 2/15/2017*

*Docket Number: 17-IEPR-06*

**ZYD Energy Comments on SB 350 Doubling Energy Efficiency Savings**

*Additional submitted attachment is included below.*



## ZYD Energy, Inc.

1520 E Covell Blvd, STE B5 # 116, Davis, CA 95616  
Phone: (916) 230-8176, Email: ydzhang@ZYDEnergy.com

February 15, 2017

California Energy Commission

Dockets Office, MS-4

Re: Docket No. 17-IEPR-06

1516 Ninth Street

Sacramento, CA 95814-5512

Re: **Staff Paper on Framework for Establishing the Senate Bill 350 (SB 350) Energy Efficiency Savings Doubling Targets**

ZYD Energy, Inc. appreciates the opportunity to provide comments on the January 23, 2017 Joint Agency Workshop on 2030 Energy Efficiency Targets hosted by the California Energy Commission (CEC) and the California Public Utilities Commission (CPUC). ZYD Energy, Inc. is a California based company that provides energy efficiency related consulting services to California Investor Owned Utilities (IOUs) and Public Owned Utilities (POUs). ZYD Energy, Inc. applauds the CEC's efforts in developing a framework to guide the further development of SB 350 energy efficiency savings doubling targets. We have the following comments and question on related issues.

POUs have been actively implementing C&S program in an effort to increase their energy efficiency program savings. While the CPUC has a clear policy on assessing energy savings potential and evaluating the energy impact of IOUs C&S programs, the CEC has not established corresponding policies for POU. We would like the CEC to address the following questions regarding this issue:

- Will the CEC include C&S energy savings realized in POU service territories in determining subtargets for POU? If not, how will these C&S energy savings be treated?
- Will POU be allowed to count savings realized in POU service territories from all standards included in 2014 AAEE savings<sup>1</sup> to meet their savings subtargets?
- Will the CEC use the same methodology and data inputs to assess C&S saving potential for POU as were used by the CPUC to determine C&S savings goals for IOUs?

---

<sup>1</sup> This refers to the midcase estimate of additional achievable energy efficiency (AAEE) savings contained in the California Energy Demand Updated Forecast, 2015-2025, which is referenced by the CEC as CEDU 2014. This version of AAEE savings is specified in the SB 350 as the basis for doubling energy efficiency savings.



**ZYD Energy, Inc.**

1520 E Covell Blvd, STE B5 # 116, Davis, CA 95616

Phone: (916) 230-8176, Email: [ydzhang@ZYDEnergy.com](mailto:ydzhang@ZYDEnergy.com)

In conclusion, ZYD Energy, Inc. appreciates the CEC's consideration of our comments and questions. Please do not hesitate to contact me with any questions.

Sincerely,

/s/ Yanda Zhang

Principal  
ZYD Energy, Inc.