

August 22, 2007

California Energy Commission
Dockets Office
Re: Docket No. 07-SB-1
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512

DOCKET	
07-SB-1	
DATE	AUG 22 2007
RECD.	AUG 27 2007

RE: Comments on Senate Bill 1 Eligibility Requirements Staff Report
Filed electronically per instructions, plus one paper copy by US Mail

Dear Esteemed Energy Commissioners and Staff,

As a follow-up to my brief oral comments by telephone during today's SB1 Public Hearing, the following written comments are hereby submitted regarding the Staff Report, *Senate Bill 1 Eligibility Criteria and Conditions for Incentives for Solar Energy Systems*.

Comments re Chapter 5: "Energy Efficiency" (particularly re existing homes):

- In contrast to the relatively well specified criteria and conditions recommended in the Solar Component Standards and Installation Standards chapters of the report, as well as the unambiguous energy efficiency criteria pertaining to newly constructed buildings, it is clear that the recommendations regarding energy efficiency criteria for existing homes are much more tentatively stated.
- Accordingly I am concerned that at least for existing residential buildings, the report may fail to provide sufficiently clear "eligibility criteria and conditions" to meet with the legislative intent of SB1.
- In particular, the conditional language used on page 40 ("conceptual idea would be to establish a system...") does not provide sufficient specificity to get the utilities and private industry partners working together to implement the relatively simple yet effective solution we all seek to grow this industry.
- To address this issue without adding unreasonable burden to the nascent but potentially vast and rapidly growing market for solar-powered existing homes, the Commission should draft and seek industry input on a simple 1 - 2 page STANDARDIZED FORM intended for use in all CSI utility areas.
- The Commission should recommend that all existing single-family home applicants complete such a form as a "condition" of eligibility to receive CSI monetary incentives. (A separate multifamily form is also recommended).
- The primary initial value of such a standardized form would be to inform in a consistent and objective manner both *sellers* (i.e., Installers) and *buyers* (Host Customers) as to the baseline consumption throughout the state, as well as the many different auditor services and DIY audit methods currently

available in California for generating cost effective energy efficiency analysis results and home improvement recommendations.

- A secondary benefit of such a standardized form would be to provide all parties with a consistent and representative body of data for evaluating the need for future Commission and/or legislative policy making in this area.
- The form would provide, as a single consistent basis for benchmarking, a simplified California Statewide Residential Baseline Analysis, reporting quartiles of average annual energy consumption¹ on a per home (absolute) and per square foot (size-adjusted) basis. Baseline data would thus be vetted by the Commission and most likely drawn from the most current representative statewide survey(s) of residential consumption.
- The form would require the Applicant to report the absolute billed energy consumption at the installation address for the prior 12 months and the method by which said consumption was determined or estimated.
- The form would require the Applicant to perform a simple comparison (benchmarking by quartile) of their site-specific absolute consumption to the statewide absolute average.
- The form would optionally encourage the Applicant to perform a simple comparison (benchmarking by quartile) of their site-specific per square foot consumption to the statewide per square foot average.
- The form would require the Applicant to choose from a standardized and approved list of efficiency audit methods (e.g., the list on page 38) and disclose what audit method(s) they chose to comply.
- The form would require the Applicant to identify (or simply attach a copy of their audit summary) all efficiency measures the chosen audit method determined to be cost effective.
- The form would require the Applicant to identify which if any of the audit-recommended energy efficiency improvements are included within the scope of work to be completed by the Installer.
- The form would require the Applicant to identify which if any of the audit-recommended energy efficiency improvements are intended to be completed by the Host Customer or another third-party (“Other”) prior to the end of the current calendar year.
- The form would require the Applicant to disclose whether the compliance energy audit was completed by the Installer, an “Installer Affiliate” or an “Independent Auditor”.

¹ fuel-source neutral, (i.e., source method)

To expedite CSI program implementation and to facilitate more effective data management, ultimately the recommended form could be integrated into a centrally administered web-based CSI program application process and near real-time incentive reservation and tracking system. Someday the Applicant-facing interface of such a system might include a secure means of requesting a customer-authorized utility bill history (for more accurate and simplified benchmarking), and one-stop access to additional decision-making tools and information resources.

Thank you sincerely for your consideration of these comments.

Respectfully Submitted,



Thomas P. Conlon
President
EnergyCheckup, a Service of GeoPraxis

