

DOCKETED

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Pacific Gas and Electric Co_CLIMB Action Plan

Additional submitted attachment is included below.

June 13, 2018

VIA ELECTRONIC FILING

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 18-IEPR-08
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Docket 18-IEPR-08: Pacific Gas and Electric Company Comments on the draft Clean Energy in Low-income Multifamily Buildings (CLIMB) Action Plan

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to provide comments on the May 29, 2018 Clean Energy in Low-income Multifamily Building Action Plan (Draft Staff Report). This Draft Staff Report was discussed at a workshop hosted by the California Energy Commission (CEC) and the California Public Utilities Commission (CPUC) on May 30, 2018. PG&E appreciated the opportunity to participate in this workshop.

PG&E offers the follow comments on the Draft Staff Report and looks forward to working with staff on this important effort. P&GE highlights the area of the report below and provides feedback on specific recommendations.

A. Cost Effectiveness:

1. (ESA): “**Cost-effectiveness.** Program development and assessment will consider cost-effectiveness for the program administrator, as well as for the building owner and tenants. For programs specific to low-income and disadvantaged communities, additional factors should be included in cost-effectiveness, such as non-energy benefits, health, safety, and resilience.” (p. 8)
 - a. PG&E agrees. In general, PG&E advocates for these separate approaches to cost-effectiveness to most appropriately account for non-energy benefits such as health, safety, and resilience. PG&E agrees with recommendations 3.1.4 and 3.3.5.

B. Electric Vehicles

1. (ESA) : “To date, the progress of these programs includes 345 electric vehicle charging stations installed in multiunit dwellings funded by the Energy Commission’s Alternative and Renewable Fuel and Vehicle Technology Program (ARFVTP)”. (p. 10)
 - a. PG&E Comment: How many of these charging stations have been installed in affordable housing complexes? PG&E urges joint agencies to evaluate the types of buildings where charging stations are being installed and identify opportunities to leverage programs that

focus on electric vehicle affordability that result in higher penetration of electric vehicle ownership in multifamily dwellings.

C. General Recommendations:

1. (ESA) “1.1 Efficiently leverage efforts of existing working groups relevant to multifamily housing. 1.1.2. Coordinate and share knowledge with relevant working groups such as the Multifamily Working Group (D.16-11-022), the Disadvantaged Communities Advisory Group (SB 350), the Community Air Protection Program Consultation Group (AB 617), and the Low-Income Oversight Board (SBX2 2, 2001). ” (p. 15)
 - a. PG&E Comment: PG&E is supportive of targeted working group coordination and knowledge sharing. PG&E encourages joint agencies to be cautious of over-burdening the Multifamily Working Group with items beyond current scope focus and priorities. The current charter through 2020 is to evaluate and make recommendations on the IOUs Common Area Initiatives.
2. (ESA) “1.2 Align efforts across existing programs to maximize benefits.” 1.2.1 “Coordinate program eligibility and education and outreach efforts for all multifamily sector energy programs and for low-income and disadvantaged communities to simplify participation.”
 - a. PG&E Comment: PG&E is supportive of simplifying eligibility guidelines. However, it’s unclear which education and outreach efforts would be coordinated and how.
3. (ESA) “1.2.3 Coordinate EV car-sharing programs with new affordable housing developments with EV charging spaces.” (p 16)
 - a. PG&E agrees with this comment and also supports pairing not only new housing developments with EV ownership programs, but also existing multifamily buildings with EV ownership programs.
1. (ESA) “1.2.5 Investigate the feasibility of including water assessments with energy audits to recommend water-saving improvements along with energy efficiency measures.” (p. 16)
 - a. PG&E Comment: Clarify what type of water assessments. For reference PG&E’s multifamily programs currently incorporate recommendations for water savings alongside energy savings improvements. PG&E’s low income program replaces water consuming fixtures with low flow fixtures, reducing hot water usage in multifamily buildings. Additionally, PG&E’s Multifamily Upgrade Program is testing the water energy nexus calculator, enabling multifamily properties to claim incentives for improvements that result in cold water savings such as low-flow toilets, landscape irrigation, rain barrels, and turf replacement.

Section 2: Gather Data on the Multifamily Market Sector

Broadly speaking, PG&E is supportive of joint agencies finding ways to gather multifamily market data to better understand the multifamily building marketplace. PG&E urges the joint agencies to consider prioritizing the types of data needed by program administrators to most appropriately manage cost. Every metric tracked comes with a cost and some metrics are more costly to procure than others. PG&E is carefully monitoring its new ESA Single Point of Contact and Common Area Measures initiatives and reporting data and progress via the Multifamily Working Group overseen by CPUC’s Energy Division.

In addition, PG&E is also working on a market assessment characterizing the energy savings potential and demographics of the affordable multifamily housing building stock in PG&E territory. PG&E expects these results to be public upon completion.

Expand and improve current building DER program offerings (Section 3.3)

PG&E supports considering the expansion of current low income direct-install programs to offer resources for deeper energy savings. PG&E is currently moving in this direction with Common Area Measures (CAM) that will enable deeper energy savings measures to be performed in common areas. If there is to be consideration of in-unit deeper energy savings measures that are low income direct-install then the funding for those measure needs careful consideration due to the cost associated with such measures. Also, we would like further clarification on the definition of “green infrastructure.”

Workforce Development Goals (Section 3.4)

PG&E supports workforce development goals in order to position the state to reach clean energy goals. However, to improve existing workforce development programs, more resources need to be dedicated to these efforts and different cost effectiveness criteria needs to be assigned to these efforts in order to measure program success.

“5.2.5 Investigate redesigning the California Solar Initiative (CSI) thermal program or establish a new program to promote cost-effective installation of PV systems coupled with high-efficiency heat pump water heating technology.” - If a new program is investigated it should be tied to and leverage the Solar on Multifamily Affordable Housing Program (SOMAH) to cover the PV portion of the cost of the program.

III. Conclusion

PG&E appreciates this opportunity to comment on the Draft Action Report and looks forward to continued participation in this important work.

Sincerely,

Valerie J. Winn