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Jeanne Clinton Comments on Joint Agency Workshop on SB 350 Equity Milestones and Implementation Progress

Additional submitted attachment is included below.

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Jeanne Clinton Comments on Joint Agency Workshop on SB 350 Equity Milestones and Implementation Progress (August 29, 2018)

18-IEPR-08

Panel 1 Community Needs & Outreach: I found very important one lesson-learned from the Ontario case example. This is the observation that the Transformative Climate Communities are reluctant to take risk on unproven ideas and approaches. This reinforces the principle that "early action" on action strategies may need to build in risk management, cost/value (performance) guarantees, or some kind of financial back-stops or purchase/loan guarantees.

Panel 2 Barriers to Clean Energy in MF Building: This panel presented highlights from the CLIMB Staff Report presentation (Clean Energy in Low Income Multifamily Buildings Action Plan). I offer a series of observations about this document:

- First, the approach clearly can be considered "Crawl/Walk first – then hopefully Jog- and maybe finally Run" in its ambition. This may be realistic given state agency resources, but requires both the addition of a vison to spur great outcomes and setting tighter schedules to ensure momentum toward those. The Action Plan also warrants further refining and prioritization, supported as needed by critical thinking and consulting help that might, for example, weight the problems to be addressed, borrow strategies already tested elsewhere, and apply quantitative estimates of potential gains from market segments and strategies under consideration to better prioritize and focus actions within the agency resources available.
- The report seems to be light on input and articulation of verified needs from property owners and managers. Next steps would benefit

from expanded market research (e.g. see work underway by PG&E) to inform options and strategies on
  - clean energy potential and costs,
  - implementation timing (e.g. stages in a building cycle and "trigger event" opportunities),
  - attractive and cost-sensible clean energy installation business models, and
  - finance mechanisms that can work for different owner profiles and building event timing.
- The large number of agencies involved in the Action Plan appears to be unwieldy for making rapid and deliberate progress toward our climate goals, and especially considering the 5-15 year cycles applicable to building ownership or reinvestment. To ensure rapid progress it may be most useful to consider either a single agency as leader, or perhaps a co-leadership assignment to one energy and one housing-expert agency. This focused leadership likely would optimize performing action plan oversight and guidance.
- The plan references the work of 8 agencies and 21 (mostly) statewide programs. These are too many. The action plan should further hone its advice to arrive at more consolidated implementation/delivery model(s), executed by an assigned entity with supporting collaborators.
- When thinking about Low Income or disadvantaged communities, it is important to keep in mind that a "household" is not the same as a "dwelling unit" or "building". Low income households are mobile; I am not aware of any analysis yet of the extent to which dwelling units remain occupied by low income households over time. Perhaps this could be approximated by having the utilities provide an address-based analysis over a period of time for their low income rate discount tariffs. Alternatively, further discussion or investigation with property owners might offer insight on this issue.

Panel 3 Financing Transformation (Sustained Investment in Clean Energy, Transportation, and Workforce Development): This panel title refers to "Financing" and "Investment, but I found the presentations and comments extremely light on these two topics.

- There should be follow-up literature review, investigation, or input sought on these two topics.
- The cited CAEATFA finance pilots may not offer useful experimentation from the perspective of tenant/occupants, or for EE measures applicable to energy paid by tenants (versus common areas paid by the owner). The parameters of the CAEATFA CHEEF pilots were constrained by the use of CPUC EE ratepayer funds and their associated resource economic metrics, and were intended to deliver pilot testing of programs that might scale to be financially self-sustaining. They do not experiment with solutions to surmount the split incentive barrier, nor the short-tenure of rental occupants.
- The Sacramento Community Car Share pilot provided an important lesson-learned that there is a "bankless community" out there; that clean energy program designs and implementation approaches need to determine how to engage communities, households, and small businesses that do not have traditional credit cards or checking accounts. A second lesson is the importance of taking (calculated or intentional) risks on implementation details and outreach techniques with pilot or early stage programs.
- There was significant focus on workforce development in this panel. Particular attention should be paid to the statement by Sarah White that "Co-benefits don't just happen" and that GGRF and CCI programs must include specific design elements to ensure that co-benefits are encouraged, achieved, and measured in some way.