

**DOCKETED**

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*Comment Received From: Alejandra Tellez/County of Ventura on Behalf of 3C-REN  
Submitted On: 5/15/2019  
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### **3C-REN Comments to EE and Building Decarbonization**

*Additional submitted attachment is included below.*



May 15, 2019

California Energy Commission  
Dockets Office MS-4  
1516 Ninth Street Sacramento, CA 95814-5512  
Submitted via Docket No. 17-EBP-01

RE: Stakeholder Input Request  
Docket No. 19-IEPR-06  
*2019 California Energy Efficiency Plan*

Dear Commissioners and Energy Commission Staff,

The County of Ventura on behalf, of the Tri-County Regional Energy Network (3C-REN) and its member counties, Ventura, Santa Barbara, and San Luis Obispo, and as a California Public Utilities Commission (CPUC) approved energy efficiency (EE) program administrator, appreciates the opportunity to provide comment for consideration in the development of the 2019 California Energy Efficiency Action Plan and respectfully submits the following comments.

- One goal from the *2016 Existing Buildings Energy Efficiency Plan Update* was to make the 2019 Building Energy Efficiency Standards easier to use/understand than previous iterations. In your view, was this goal achieved?
  - *In some ways the goal was achieved and in other ways there is room for improvement. Reputable resources, tools, and educational offerings are available via Energy Code Ace, the California Energy Commission (CEC), the California Association of Building Energy Consultants (CABEC), the Workforce Instructions for Standards and Efficiency (WISE), local chapters of the International Code Council (ICC). However, many of the offerings provided are not locally available to interested parties in rural and underserved locations. Some jurisdictions may not grasp the value of the Energy Code if they are not diligent about understanding the Energy Code changes or the need for emphasizing compliance. This results in the private sector not embracing and implementing the code.*
  - *Further, the Energy Code could be more precise in requirements for compliance, especially regarding the performance path. There are many options for compliance that require reviewers or those inspecting a project to be an "expert" in energy efficiency and how it relates to specific systems being modeled. This creates a problem for overloaded building department staff who may not be "experts" in EE. Additionally, many are being pushed to focus on life and safety as the top priority. Time for compliance review is maximized for*

*this top priority.*

- *Regarding design and energy consulting in the private sector, there are many offerings that cater to them. However, there is a lack of hands-on trainings available to contractors that show application of fundamental building science approaches required by the Energy Code.*
  - *There is still much confusion about the use of required forms and when EE standards are triggered for both the public and private sectors. Many jurisdictions have little automation for this, so the complexity of the code and forms completion can hinder review in a timely manner. With life and safety as a key factor, the process often lends itself to missed or less accurate EE compliance identification.*
- What are the immediate steps you recommend taking to improve compliance with building energy standards?
- *Improve user access and enforceability by organizing the Code with a searchable index and table of contents for online reference.*
  - *Require a Certified Energy Analyst (CEA) model every new residential and nonresidential construction project.*
  - *Begin offering hands-on trainings across the state for contractors and market trainings specifically to contractors with a consideration of their work schedules and availability.*
  - *Continue to allow/advocate for Regional Energy Networks (RENs) to provide educational offerings, tools, and resources to rural and underserved communities across California.*
  - *Continue to support and coordinate with RENs on educational offerings, tools, and resources.*
  - *Streamline and automate forms. Create simple, easy-to-read user guides in multiple languages that can be available at counters.*

## Benchmarking

- Are building owners looking at their energy consumption or just reporting to benchmarking?
- *This is dependent on regional requirements, as well as consideration of the building owner/operator relationship. Building owners who pay for energy are more likely to do both, review their energy consumption and comply with benchmarking, if they are offered appropriate levels of support. If the owner does not pay for energy, it is less likely that they will comply with benchmarking requirements, will likely not be able to review or be concerned with consumption, and are less likely to invest in EE upgrades. Additional support is needed beyond benchmarking, with a whole building analysis and recommended EE measures, for actionable management and upgrades that lead to energy savings to occur.*

- What type of encouragement or support, beyond monetary, would lead to improved benchmarking scores over time?
  - *Market demand for energy efficient buildings is a great encouragement to building owners/operators. Providing resources and support to allow for a better understanding of how and the need to comply. Simplify and make it easy and non-time consuming to comply.*
  - *Continue to fund and support programs like those offered through RENs and Local Government Partnerships (LGPs) that provide the needed support to comply with Benchmarking requirements.*

#### Market Transformation

- How can local governments continue to support and/or expand energy efficiency efforts?
  - *Provide continued funding for LGPs and stop, slow, or reverse the funding cuts by investor owned utilities (IOU).*
  - *Recognize that RENs and LGPs are uniquely positioned to influence and assist local government agencies in assessing and implementing energy projects and meeting goals, especially in underserved, rural, and hard-to-reach communities.*
- Which private-sector financial mechanisms have been most successful in supporting energy efficiency?
  - *On Bill Financing is an effective tool but should not be considered an “incentive” for customers in smaller rural markets. This is primarily due to Industry Standard Practices (ISP) being out of touch with smaller and rural markets as most ISP studies are conducted in larger markets, e.g. Los Angeles and San Francisco.*
  - *Direct Install programs have been effective for small to medium businesses and should be for residential customers. There are still large portions of the state that have been untouched by these programs, meanwhile eligible measures are being cut leaving stranded savings opportunities.*
- What changes, if any, are expected or ongoing in the energy efficiency market due to the expansion of community choice aggregators (CCAs)?
  - *CCAs can be a resource for program administrators as they offer an opportunity to provide outreach among their eligible customers for energy efficiency programs.*
  - *CCAs and RENs can coordinate to provide support to reach underserved markets.*
- Have you seen improvements in energy efficiency marketing, outreach, and education efforts? If not, what areas are still undeveloped? Please provide examples.
  - *No Comment.*
- In your opinion, what retrofit programs (please specify sector) are most successful? What makes the program successful?
  - *The complexity of process, forms, and requirements for retrofit programs yield*

*low margins of approvals and ineffective outreach and support are often a hurdle for participants. Residential and Commercial DI programs are most successful since upgrades and associated savings are immediately realized. While DI programs can eliminate the complexity of attributing savings from a list of measures and makes it easier for participants to accept and agree to installation, there is opportunity to improve outreach and education for programs. Especially in the underserved areas of the state.*

- What barriers remain for energy efficiency to be a reliable grid resource? Are there data limitations, lack of quality results, lack of awareness, etc. What immediate steps do you recommend the Energy Commission take to resolve these barriers?

- *Historically, accurate energy use and EE program participation data access at the regional and city level for local governments has been a large limitation and barrier to making energy efficiency data a useful tool and resource. IOUs provide data by zip code and often zip codes overlap in municipal boundaries making it difficult to isolate citywide data. Recommendation is for census tract level data.*
- *Wait times from request to delivery of data impede reporting and planning activities, especially when data is inaccurate, inconsistent from year-to-year, and multiple data requests are required to get useful data sets. Recommendation shorten time by when IOU's have to deliver data*
- *Data received from IOUs by local governments is often unusable for a majority of program development, or larger regional planning purposes. Inconsistencies in data outputs since most often than not they way IOU pulls data changes year to year makes developing, tracking, and monitoring any type of program and makes developing regional EE approaches difficult. Recommendation have IOU's deliver consistent data year to year.*

IOU forms for data requests are overly complicated. Simplification of the request process (especially for those who request data on a regular basis).

- *To overcome some of the data quality concerns, the Energy Commission could research further and push for the IOUs to deliver standard data outputs at the census tract level that can be meaningful to stakeholders.*

## Building Decarbonization

- What are the main concerns with implementing programs that focus on reducing carbon emissions from buildings?
  - *Two main concerns emerge: Enforcement and compliance costs; and Low or slow Building professional/industry adoption.*
- Heat pump water heaters and space conditioners are expected to play a role in building decarbonization, they currently occupy a small portion of the market; what actionable steps do you think are viable to improve the market potential of the technology?
  - Explore ambient air-source technology widely used across the globe for units that are unducted, exhaust only ducted and fully ducted options. A small

selection of vendors are currently available for use in the United States. Opening the market to manufacturers with simpler installation mechanisms could drive down the installed cost of equipment.

#### Low Income and Disadvantaged Communities

- What type of energy efficiency programs are shown to be most successful in low-income and disadvantaged communities? Please cite any evidence such as program results or customer testimonials.
  - Provide and support mechanisms to accurately and regularly collect, track, and report demographic/local-level data on program participation.
  - Simplify EE program processes. One ACEEE study shares a series of best practices to help reach underserved populations, many of which RENs currently include in their implementation plans. Examples offered included integrating direct install and rebate programs, streamlining rebates and incentives processes, offering multiple pathways to participate, and incorporating up-front capital/financing such as on-bill repayment. The study is available at [http://energyefficiencyforall.org/sites/default/files/Lifting%20the%20High%20Energy%20Burden\\_0.pdf](http://energyefficiencyforall.org/sites/default/files/Lifting%20the%20High%20Energy%20Burden_0.pdf).

#### Standards Compliance

- In your experience, what are the primary drivers of non-compliance with building standards?
  - Key concerns include code complexity, unclear forms guidance, inconsistency in code application, lack of mechanisms to enforce compliance, and perceived costs associated with compliance and permits.

#### Workforce Development

- No Comment

We appreciate the opportunity to provide comment and thank the CEC for carefully considering 3C-REN's response to the request for comments.

Respectfully Submitted,

/s/ Alejandra Téllez

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Ventura, Santa Barbara, and San Luis Obispo Counties