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Subject: NCPA Comment in Response to NRDC's 12/15 Comments on the IEPR

Energy Commissioners and Staff,

Given that the Natural Resources Defense Council (NRDC) comments on the draft IEPR was posted yesterday, I am providing this response via e-mail. I apologize I will not be able to attend the business meeting in person but am compelled to respond in some manner. I would appreciate this response be included in the public record.

As the IEPR seeks adoption today, I must strongly object to NRDC's recommendation proposed in its December 15th comments on the IEPR. NRDC recommends on Page 3 of its comments that the Energy Commission should "develop a working group or facilitate a series of working meetings to develop solutions for challenges faced by the POUs in capturing all cost-effective energy efficiency." Prior to the recommendation, they argue that:

"While the current workshops provide an opportunity to showcase best practices and identify challenges, they have not facilitated the continuing discussion necessary to overcome the real and perceived barriers that POUs face when planning for and implementing energy savings programs. We therefore urge the CEC to establish a working group or facilitate a series of working meetings to provide a collaborative forum that allows key players to delve into workable solutions to overcome the most significant barriers that POUs face. NRDC would be an active participant in such a forum and recommends the CEC include the language below in the Final IEPR." (NRDC Comments, Page 3).

NRDC refuses to acknowledge publicly (and continually misrepresents) that public power has taken considerable steps during the past four years to partner with the Energy Commission to address the key policy issues that promote and deploy energy efficiency programs. Since 2006, the California Municipal Utilities Association, in

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conjunction with NCPA and the Southern California Public Power Authority has produced three annual energy efficiency status reports and one triennial target setting report. Each report has been submitted on time, and our results show that our programs continue to produce more energy efficiency savings each year. We are working diligently on the next report which is due next March. I can assure you that report will be submitted on time and will contain even more detail that will be useful for Energy Commission analyses as it prepares for the 2011 IEPR.

To suggest that public power has not facilitated a continuing discussion is unwarranted, misleading to policymakers and legislators, and not in the spirit of collaboration. We have been forthcoming with information in a manner that has gone well beyond the reporting requirements imposed on public power by the legislature and continue to work closely with the Energy Commission to address issues of mutual concern.

NCPA recommends that NRDC's recommended addition to Page 225 of the report be rejected.

As we near the end of the year, I want to thank the Energy Commission staff for working with the public power community to develop approaches that balance the policy objectives of the Energy Commission with public power reporting and program responsibilities. It has been really helpful to have an open dialogue regarding energy efficiency and renewables issues, and we look forward to a continued partnership with the Energy Commission.

Respectfully,

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