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SCPPA Comments RE Building Energy Performance Strategy Report

Attached.

Additional submitted attachment is included below.



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September 19, 2023 | [Submitted electronically](#)

California Energy Commission
Docket No. 24-BPS-01
715 P Street
Sacramento, CA 95814-5512

RE: California Building Energy Performance Strategy Report

The Southern California Public Power Authority ("SCPPA") appreciates the opportunity to provide feedback on the CEC's development of the California Building Energy Performance Strategy report.¹

1) Stakeholder Contact Information and Areas of Interest

1.1) **Names & email addresses of public contacts for you and your organization:** Elisabeth de Jong, Government Affairs Manager, SCPPA: edejong@scppa.org

1.2) **Areas of interest in this report development process:** SCPPA Members are keen to engage with the CEC during the development of this report, focusing on energy efficiency, potential impacts on publicly owned electric utilities (POUs) resulting from CEC recommendations to the legislature, and ways to protect utility ratepayers. As identified stakeholders under Public Resources Code § 25402.16(d), POUs, including SCPPA Members, we represent a diverse array of energy utilities.

SCPPA's Members vary in size and have unique goals, local priorities, customer demographics, and technological and resource constraints. For instance, Banning Electric Utility operates within a small, 22 square mile territory, serving customers with an average median income that is about half the state average. In contrast, the Los Angeles Department of Water and Power (LADWP) is the largest municipal utility in the nation, covering over 471 square miles in the City of Los Angeles proper in addition to the Owens Valley Electric System. Uniquely, other SCPPA Members, such as Vernon, primarily serve non-residential customers. Each POU faces its own policy directives from local governing boards and resource constraints related to transmission access, resource availability, geography, and existing resource mix. While supporting the state's ambitious goals, SCPPA Members must always account for these unique circumstances and consider the impacts on their customers, including those in low-income and disadvantaged communities.

SCPPA's interest in building energy performance is to support the local grid and protect affordability for the community. It is important to consider this cost barrier and how property owners can recoup the costs while protecting affordability for tenants of multi-family buildings, particularly considering buildings with strict rent control. For example, the high up-front cost of retrofitting existing buildings, especially old electric main service panels and subpanels to

¹ <https://efiling.energy.ca.gov/GetDocument.aspx?tn=257777&DocumentContentId=93682> and <https://efiling.energy.ca.gov/GetDocument.aspx?tn=256467&DocumentContentId=92297>

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accommodate new electric loads, may create challenges for homeowners, landlords and tenants – especially in lower income communities. Many SCPPA Members offer programs to support customers, such as energy efficiency updates with rebates or direct installations that are directly tailored to the needs and priorities of the communities. Building performance standards are best implemented by phasing them in beginning at municipal and government buildings, large commercial, and large multi-family buildings. Finally, when it comes to the policy recommendations spurred by this report and other building standards related to electrification and electric service, SCPPA encourages the CEC to incorporate considerations and regulatory flexibility that can accommodate the unique characteristics of SCPPA Members' and other POUs' grids. We look forward to engaging and sharing their unique perspectives throughout this process.

- 1.3) **Description of your organization and constituency represented:** SCPPA is a joint powers authority, governed by a board of local officials, whose members include the cities of Anaheim, Azusa, Banning, Burbank, Cerritos, Colton, Glendale, Los Angeles, Pasadena, Riverside, Vernon, and the Imperial Irrigation District. Together, SCPPA Members deliver electricity to over two million customers throughout Southern California, spanning an area of 9,000 square miles. SCPPA Members are not-for-profit, publicly owned electric utility (POU) that serve their local community and are governed by a board of commissioners and/or locally elected public officials.
- 1.4) **Best way to outreach and engage with your constituency:** SCPPA is a member-driven public agency that supports the goals and strategies of its members in various ways, including facilitating joint action on energy efficiency programs and collaborative advocacy. As such, SCPPA can disseminate information to SCPPA Members, coordinate feedback from SCPPA Members to the CEC on energy efficiency policies, and engage in or host meetings directly with SCPPA Members and the CEC's Building Energy Performance Strategy report team.

Comments on load flexibility and resiliency:

As described above, each POU has unique characteristics and challenges. When evaluating the data expected from, and impacts on, POUs, it is crucial to consider various factors such as the size of the POU, land and transmission constraints, and the demographics of customers, particularly those in disadvantaged or low-income communities. For instance, not all SCPPA Members have Advanced Metering Infrastructure (AMI) systems or the related data to share with the CEC. Several SCPPA Members are in the process of phasing in AMI systems. While POUs recognize the benefits, especially of "AMI 2.0" systems that Members are considering, AMI systems are costly because utilities must upgrade billing software at the same time to be able to bill customers with the new AMI technologies. Adding to these cost considerations, AMI systems need to be replaced more frequently than traditional meters. In addition to the cost considerations, POUs have to conduct extensive outreach and education prior to deploying new AMI systems, addressing customer concerns including privacy and general resistance to change. POUs, particularly smaller ones, would benefit from support, especially in the form of funding, to implement AMI systems within their service territories.

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POUs engaged and advocated during the CEC's Load Management Standards (LMS) proceeding, explaining that utility ratemaking is a complex and nuanced process that entails considerable resources. Policies that require utilities to revisit ratemaking processes would create considerable administrative burden on smaller POUs. It is therefore critical that LMS does not further extend beyond the five utilities currently required to comply. Small POUs do not have the staff time and resources needed to support and effectively manage and implement the detailed requirements of LMS. Requiring smaller POUs to implement these standards could place an undue burden on their limited personnel, diverting attention from other critical operational tasks.

Many POUs have clean energy goals that outpace statewide requirements, and POU governing boards are already well positioned to tailor rate structures to the unique needs of their communities in order to best meet local and statewide energy priorities. Imposing uniform standards could undermine this local governance, leading to less effective and less responsive rate management.

Thank you for the opportunity to provide comments on the development of the Building Energy Performance Strategy report.

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