

DOCKETED

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AB 802 Emphasis on Education and Enforcement

Additional submitted attachment is included below.



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AB 802 Emphasis on Education and Enforcement

CommEnergy has enjoyed a good business providing benchmarking for Realtors and Property Managers in the Bay Area for the past two years. CommEnergy's outreach emphasis has been education after 5 years as an Instructor at PGE PEC. Presentations "***Benchmarking: The New CRE Metric***" were made with many in-office commercial Realtor presentations, webinars, the CCIM Oakland meeting and several NCAAR meetings. Many accepted that EnergyStar scores were now part of their tool bag along with: Energy Efficiency, Auditing, and Increased Property Value. A strong database has kept the Bay Area CRE community updated on AB1103 Benchmarking. Needless to say, I was not excited when I heard of AB802 and the demise of AB 1103. Yet it is time to morph into a new level of benchmarking and auditing. That's why I completed the AEEE CEM course in Las Vegas last week.

As the State goal is to increase energy efficiency, then continual Benchmarking is the first step. The problem with AB 1003 was that the benchmark was completed on the property being sold, yet very few new owners continued with the benchmarking process. The AB1103 benchmarking effort resulted in a report that few read and resulted in little energy efficiency measures, EEM. It was a start in the right direction.

Thus I applaud AB 802 as it sets the stage for annual benchmarking and reporting to the public. The 50,000 SF mark leaves many potential building improvements untouched in the 10,000 and 20,000 SF range. The annual reporting is consistent and will portray historic energy levels to owners that when paired with the

utilities rebates for EEMs, in September, will result in energy efficiency gains and lower carbon footprint for many buildings.

The whole program will gain that traction in the market place with two E's:

Education and Enforcement. Those two elements were not present with AB 1103 and thus I emphasize the need for the development in AB 802

Education It is one thing to tell someone what they must do to comply with the law and another when you can show them the process and how they may save money. ***Energy Efficiency Savings Education*** needs to lead the rollout.

Target populations to educate as part of initial outreach:

Building Owners

Property Managers

Commercial Realtors

Title Officers

Repetitive Outreach educating on the topics of:

Benchmarking uses and laws

Energy Efficiency

Financing

Saving Money

The development of an Educational program is essential and CommEnergy is prepared to share and enhance its tools.

Enforcement is now part of AB 802 as the civil fines are authorized by the bill. Many lawyers and realtors laughed at AB 1103 as there were no teeth in enforcement. When the CEC steps up with hefty fines for noncompliance from the beginning, people will acknowledge and comply. The CEC needs to develop an effective enforcement process for this rollout.

Part of that enforcement is **publically listing the EnergyStar Scores** from the beginning. All the properties have all of 2016 to prepare for their public score. Any delay in listing, only weakens the rollout and acceptance of AB 802.

In sum, CommEnergy is stepping up its credentials and participation in the development of AB 802 rollout. There is a great deal to accomplish in best defining and executing the goals of the Assembly and of the State of California.

Thank you for your attention and collaboration.

Rick Williams

