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Comment Received From: Michael Callahan-Dudley

Submitted On: 8/25/2016 Docket Number: 16-0IR-02

CEC Workshop to Identify Barriers to Access to Renewable Energy and Energy Efficiency for Low-Income Individuals

Additional submitted attachment is included below.



Kathrin Sears, Chair County of Marin

Tom Butt, Vice Chair City of Richmond

Bob McCaskill City of Belvedere

Alan Schwartzman City of Benicia

Sloan C. Bailey Town of Corte Madera

Greg Lyman City of El Cerrito

Barbara Coler Town of Fairfax

Brandt Andersson City of Lafayette

Kevin Haroff City of Larkspur

Sashi McEntee City of Mill Valley

Brad Wagenknecht County of Napa

Denise Athas City of Novato

P. Rupert Russell Town of Ross

Ford Greene Town of San Anselmo

Genoveva Calloway City of San Pablo

Andrew McCullough City of San Rafael

Ray Withy City of Sausalito

Emmett O'Donnell Town of Tiburon

Bob Simmons City of Walnut Creek August 25, 2016

California Energy Commission

Dockets Unit

Re: Docket No. 16-OIR-02 1516 Ninth Street, MS 4 Sacramento, CA 95814-5512

Re: CEC Workshop to Identify Barriers to Access to Renewable Energy and Energy Efficiency for Low-Income Individuals

Marin Clean Energy ("MCE") hereby submits its comments on the August 12, 2016 workshop that examined barriers faced by low-income individuals in accessing renewable energy and energy efficiency as directed by Senate Bill ("SB") 350 (2015), held at the California Energy Commission ("CEC"). MCE appreciates the opportunity for MCE's General Counsel Elizabeth Kelly to present as a panelist during the workshop.

Introduction

These written comments include a summary of the remarks provided by Ms. Kelly and include the one page handout provided to the attendees during the workshop. As stated in the workshop, MCE recommends a greater degree of simplicity and clarity in programs delivering energy efficiency and renewable energy services to incomequalified participants.

Recommendations to Address Barriers

The greatest barrier to the provision of energy efficiency and renewable energy to low-income communities is one of empathy. Policy solutions need to be based on an understanding of needs and incentives of the target audience. Appropriate policies will incorporate these needs and incentives in a way that is simple and clear for all entities involved in program delivery, particularly the customer.

MCE provides several recommendations and acknowledges that some recommendations are already underway. The CEC should recommend programs: (1) include simple and clear forms and customer interface; (2) provide an easy means for contractors and implementors to participate; (3) coordinate eligibility criteria between programs, where

possible, and (4) incorporate manageable metrics and compliance requirements for program administrators.

The CEC should encourage the development of more robust alternative eligibility criteria for customers to qualify for low-income programs to reduce barriers to enrollment. Additionally, the CEC should encourage integration of programs across technologies and funding sources to: (1) deepen the resources available to individual participants; (2) make programs more cost-effective; and (3) streamline program delivery. The CEC should also recommend that tools, such as CalEnviroScreen, be adapted or supplemented to identify relatively granular pockets of low-income communities nested within moderate-income and high-income communities. The CEC should also encourage programs that address health and safety challenges to be leveraged with programs that deliver energy efficiency and renewable energy for low-income communities. MCE requests the CEC recommend these changes to reduce barriers faced by low-income individuals in accessing energy efficiency and renewable energy.

Conclusion

MCE thanks the CEC for the opportunity to provide input and for their thoughtful consideration of these comments. MCE looks forward to continued participation and thanks CEC staff for addressing these important issues.

Sincerely,

Michael Callahan-Dudley Regulatory Counsel

¹ Marin City and the Canal District within San Rafael are two examples of such communities within MCE's service area.

Attachment A: MCE Handout Provided at August 12, 2016 Workshop



MCE's Solutions to Barriers Faced by Low-Income and Disadvantaged Communities to Energy Efficiency and Renewable Energy

MCE provides our low-income and disadvantaged communities with a wide range of energy efficiency and solar offerings. In addition, our Low-Income Families and Tenants (LIFT) Program proposes increasing the number of services that we offer to these communities.

Existing MCE Energy Efficiency Offerings

MCE currently administers energy efficiency programs in four key areas: multifamily, single family, small commercial, and financing. Due to CPUC requirements, MCE's current programs are limited to innovative offerings and areas not well served by other programs.

HIGHLIGHT: MCE'S MULTIFAMILY OFFERINGS

Since 2012, MCE has provided energy efficiency services to multifamily residences, which have included:

- » Energy assessments
- » Energy and water saving measures for tenant units
- » Technical assistance

DID YOU KNOW?



of the multifamily residences that MCE's EE program served **WERE LOW-INCOME** (in 2015 alone)

AS OF DECEMBER 31, 2015, MCE HAS:

389 MWH &
53,277 THERMS
OF ENERGY
SAVINGS

SAVED
15
MILLION
GALLONS
OF WATER

AUDITED

627

MULTIFAMILY
BUILDINGS

\$427K+

PROVIDED

1,179

UNITS WITH ENERGY SAVING EQUIPMENT

Existing MCE Renewable Energy Offerings

Available to Low-Income Customers

SOLAR INCENTIVES

MCE has allocated \$80,000 in rebates for new residential solar installations and partners with Grid Alternatives to offer \$800 rebates to low–income customers who install solar panels.

DISCOUNTED RATE

Low-income, CARE-eligible customers are able to receive the CARE discounted energy rate in full with MCE.

MORE RENEWABLES

All MCE customers receive 50% renewable energy by default. The following two MCE 100% renewable energy offerings are equally available to low-income customers and particularly benefit renters and others who are unable to place solar on their roofs.

- » Deep Green: 100% renewable energy for an average premium of \$5/month for residential customers.
- » Local Sol: 100% locally produced solar energy at a rate that remains fixed for up to 20 years.







LOCAL JOBS WORKFORCE

2,400+ TOTAL CALIFORNIA JOBS

MCE's commitment to community and the environment extends beyond supplying renewable power. MCE partners with local organizations and businesses to bring jobs home by investing in new community-based solar projects. MCE's contracted power projects have supported more than 2,400 California jobs. MCE follows a Sustainable Workforce Policy, adopted by MCE's Board of Directors.

SAN RAFAEL AIRPORT SOLAR PROJECT

As a model of business working to create local green jobs, Synapse Electric hired 20 workers, identified by the Marin City Community Development Corporation, a local job training program for low–income individuals, and CLP Resources, to install solar panels at the San Rafael Airport. The project was financed locally by the Bank of Marin and San Rafael businessman, Joe Shekou. San Rafael–based REP Energy designed the installation, REC Group manufactured 85% of the solar panels, and Power–One supplied all inverters. Both the solar panels and inverters were American–made.

ENERGY EFFICIENCY JOBS FOR LOW-INCOME & DISADVANTAGED WORKERS

MCE has contracted more than \$200,000 with RichmondBUILD, the Marin City Community Development Corporation, and Rising Sun Energy Center to train and provide workers to help implement energy upgrades for our energy efficiency programs. MCE is joining with Richmond Works on a new solar installation that will employ local residents under the Richmond Local Hire Ordinance.

MCE's Low-Income Families and Tenants (LIFT) Proposal

LIFT MULTIFAMILY COMPONENTS

- » Expanding on existing energy efficiency programs for income-qualified customers to provide additional incentives and achieve deeper energy savings.
- » Using an alternative enrollment processes to reduce concerns related to privacy and immigration status.
- » Creating opportunities for switching from natural gas combustion appliances to heat pumps in order to support cleaner and more efficient energy use.
- » Delivering On-Bill Repayment options for financing energy efficiency improvements.

LIFT SINGLE-FAMILY COMPONENTS

- » Launching a mobile platform-based behavioral program that encourages low and no cost changes to reduce energy use and save money.
- » Depositing funds equal to twice the energy saved to reinforce the existing savings; these funds can be spent on additional energy savings investments.



FOR MORE INFORMATION, PLEASE CONTACT:

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