

## DOCKETED

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*Comment Received From: Laurie Park*

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## **Increasing Participation of Private Entities in EPIC**

*Additional submitted attachment is included below.*



October 7, 2016

California Energy Commission  
Dockets Office, MS-4  
Re: Docket No. 16-EPIC-01  
1516 Ninth Street  
Sacramento, CA 95814-5512

SUBJECT: Working with California's Private Sector: Increasing Participation for Research Grant Funding

Synergy, Inc. is a 501c3 tax-exempt corporation dedicated to advancing environmental sustainability through education. One of the activities in which we are engaged is identifying new technologies that have significant potential for the state of California at the nexus of Food, Water, Energy and Climate.

Through these activities, we have become aware of some of the challenges that private entities face in trying to apply for EPIC grants. We wanted to share our observations with you, in hopes that some of the barriers that we have observed can be alleviated in future solicitations. We have organized our comments along the questions posed by the CEC in its September 22nd workshop.

**1. *What are some concerns and challenges the private sector, including small businesses and entrepreneurs, face when considering applying for grant funding opportunities?***

One of the barriers that applicants face is the sheer breadth of an EPIC application. There are typically about 11 attachments that need to be submitted. The Project Narrative (Attachment 4) asks many questions that require deep knowledge of California's energy policies and regulatory protocols. Most technology developers know their technologies and their targeted markets, but are not experts in California's energy policies, regulations and protocols.

**2. *How can the Energy Commission better increase awareness of the research programs to California private sector companies?***

It would be helpful to conduct targeted outreach through industry associations prior to issuing solicitations for technologies that would benefit those industries. It could also be beneficial for industry associations to co-sponsor some solicitations and encourage their members to apply.

**3. *What are some ideas to encourage private sector companies to apply for research funding?***

We believe that many more technologies would be proposed via EPIC if the application process could be simplified and focused more tightly on the technologies themselves. Some thoughts:

- Describe the technology: what it is, how it works, and why it would be beneficial for California.
- Describe the proposed project and what it is designed to achieve. If the project is a full-scale technology demonstration, require a letter of commitment by the proposed site host (as is currently done now).



We recommend that anything that is not needed to assess the merits of the technology and/or the viability of the proposed project in context of the EPIC goals and objectives stipulated for that solicitation be removed or significantly streamlined. For example:

- Attachment 4 asks Applicants questions that provide the opportunity to be creative in prose but that are not needed to assess the merits of the technology(s) and/or project(s) being proposed.
- Another part of Attachment 4 asks Applicants to frame the benefits of their proposed projects in a manner that requires substantial knowledge and understanding about the metrics and regulatory protocols used by the CEC, CPUC, ARB, DWR and other state agencies.

This becomes problematic for many reasons, including: (i) there are differences among the state agencies as to which metrics are used for which purposes, and how they are computed; and (ii) many of these computational methods and the data and assumptions that they employ are still evolving.

Proposals could be significantly simplified if these types of elements are removed from competitive scoring. Instead, Applicants could be asked to provide simple statements about their technology's performance; e.g.,

- The amount of electricity (kWh) that will be saved by their technology (vs. "conventional" technologies that seek to accomplish the same or comparable functions).
- The amount of electric demand (kW) that will be reduced.
- Any other benefits claimed that are relevant to that EPIC solicitation (e.g., "quantity of recycled water produced").

Applicants should then describe the bases for their estimates and cite sources (bench studies, pilot demonstration projects, engineering analyses, etc.). This would enable the Energy Commission to compare the benefits claimed by various proponents on an equivalent basis.

**4. *Besides grant funding, what else can the Energy Commission do to help California private sector companies to be successful?***

We believe it would be beneficial if elements common to all applications (e.g., estimating the energy, water, greenhouse gas, criteria air pollutants, and other benefits achievable by this technology, and then conducting EM&V to validate the claimed benefits) are eliminated from competitive scoring and instead managed centrally by the Energy Commission through a combination of CEC-developed and managed tools, and pre-approved EM&V contractors that conduct and report their independent verification of claimed benefits to the Energy Commission (and not to the Applicants). This would help to assure that the estimated benefits and evaluations were prepared on an objective and consistent basis, and in accordance with the Energy Commission's policies and protocols.

Thank you for this opportunity to provide comments on this important program.

Sincerely,

Laurie Park  
President