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Enervée Comments on draft EBEE Action Plan – 2016 Update

Additional submitted attachment is included below.



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Enervee Comments on draft EBEE Action Plan – 2016 Update

Enervee welcomes the opportunity to share our thoughts on the draft Existing Buildings Energy Efficiency Action Plan – 2016 Update.

Founded in California in 2011, Enervee has built a global data & cloud computing platform that analyzes consumer product markets in real time and provides online marketplaces that engage customers, activate clean energy markets and drive energy savings. We currently operate marketplaces serving roughly 12% of all US households, on behalf of leading public and private utilities, including three of the largest utilities in California, as noted in the draft AP Update.

Enervee would like to expand on the material already included in the sections on plug-load efficiency and data-driven decision making. The utility-branded, consumer-facing product efficiency marketplaces highlighted on pages 24 and 41 of the report rely on daily updated consumer product market data. The value of the underlying data goes beyond the Marketplaces themselves.

To advance strategies in the EBEE AP, the data behind the utility Marketplaces can also be leveraged by government entities to:

1. Establish dynamic performance specifications. This capability can support government leadership in product procurement (Strategy 1.1.1, p. 11; Strategies 1.6.6 and 1.6.7, p. 25), inform standard-setting processes (Strategies 1.6.1 and 1.6.3, p. 25) and support voluntary innovation programs directed at consumers, retailers and/or manufacturers.

2. Track consumer product market transformation indicators in quasi real-time (Strategies 1.6.4 and 1.6.5, p. 25).
3. Perform market surveillance functions in support of Title 20 compliance efforts (Strategy 1.6.2, p. 25).

Linked to the first point listed above, we suggest that Strategy 1.6 be expanded with an additional strategy:

Speed market introduction & diffusion of the most efficient, cutting edge products. Explore utility incentive programs to reward early adopters, leading manufacturers and proactive retailers, relying on dynamic, high-performance product specifications.

This recommendation is aligned with key strategies in California's Codes & Standards Action Plan, including enabling market transformation toward highly efficient appliances and coordinating appliance efficiency initiatives to facilitate the development and adoption of high performance and efficient appliances. In the absence of formal reach standards, virtually real-time promotion of the top part of the market for any given device category – not based on a fixed regulated standard, but on the most efficient products on offer any given day or month – is a feasible and promising option, as demonstrated by the utility-branded Marketplaces described in the Update.

It might also be helpful to include information under Goal 5 on how the strategies in this AP Update relate to the recommendations that the CEC is making to the legislature on low-income barriers and solutions in the context of SB 350.

Sincerely,



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