

## DOCKETED

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## **NRDC Comments on Staff Workshop**

*Additional submitted attachment is included below.*

**Comments of the Natural Resources Defense Council (NRDC) on the  
2017 Integrated Energy Policy Report (IEPR)  
Staff Workshop on Methodologies for 2030 Energy Efficiency Target Setting  
Docket Number 17-IEPR-06  
June 27, 2017  
Submitted by: Mohit Chhabra  
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**I. Introduction and Summary**

The Natural Resources Defense Council (NRDC) appreciates the opportunity to offer these comments on the 2017 IEPR Staff Workshop on Methodologies for 2030 Energy Efficiency Target Setting on June 19, 2017. NRDC is a non-profit membership organization with more than 80,000 California members who have an interest in receiving affordable energy services while reducing the environmental impact of California's energy consumption.

**II. Discussion**

NRDC appreciates the Energy Commission staff's efforts to establish a thorough and transparent process to develop SB 350 compliant energy efficiency savings targets. NRDC's comments are in response to the material presented at the staff workshop on June 19<sup>th</sup>. NRDC intends to participate in the SB 350 target setting process as it evolves and provide feedback as Staff further develop details on SB 350 target setting.

- SB 350 Energy Efficiency Target Framework Update: NRDC supports the correction applied to CEC's interpretation of doubling of cumulative savings forecast for Mid-Additional Achievable Energy Efficiency (AAEE) through 2030. The correction is an appropriate interpretation of the growth rate of cumulative savings estimate beyond 2025.
- CPUC IOU Energy Efficiency Goal Setting: NRDC appreciates the CEC's efforts to coordinate its efforts on quantifying SB350's aspirational energy efficiency target with the CPUC's energy efficiency Potential Goals & Targets study. This will ensure that results from the CPUC study are additive to CEC's estimate of non-IOU and naturally occurring energy efficiency savings forecasts.
- Conservation Voltage Reduction (CVR): The CEC appropriately characterizes CVR as an integral part of the strategy to meet SB350's energy efficiency goals. NRDC looks forward to reviewing and providing feedback as the CEC proposes next steps to ensure that cost-effective CVR is explored by the publicly owned and investor-owned utilities.
- Fuel-Substitution: The CEC has identified important questions that need to be resolved to enable the utilization of fuel-substitution to further California's GHG mitigation objectives. These questions are well aligned with a motion NRDC filed with the CPUC to

review the current CPUC three-prong test for fuel-substitution for clarity, utility, and alignment with Commission policies and California's climate goals (see Attachment 1). We also propose modifying the test as needed and providing clear guidance on the methodology and baseline for conducting the test. Further investigation of this topic at both the CEC and CPUC should lead to alignment in the interpretation of fuel-substitution between the two agencies and with California's broader GHG mitigation objectives.

### **III. Conclusion**

Thank you for your commitment to energy efficiency and for the opportunity to comment on the 2017 IEPR Workshop on 2030 Energy Efficiency Targets. We look forward to working with the CEC staff and stakeholders on the 2017 IEPR and the energy efficiency targets. It is critical to the success of SB 350's doubling of energy efficiency savings goal to set up the right framework to drive the right outcomes regarding energy, GHGs, and costs.