

## DOCKETED

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**Rising Sun's Comments on CEC Draft Report SB 350 Doubling Energy Efficiency Savings by 2030**

*Additional submitted attachment is included below.*



## RISING SUN ENERGY CENTER

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September 21, 2017

California Energy Commission  
Dockets Office, MS-4  
Re: Docket No. 17-IEPR-06  
1516 Ninth Street  
Sacramento, CA 95814-5512

Via Electronic Commenting System

Re: Docket No. 17-IEPR-06-Comments of Rising Sun Energy Center on the California Energy Commission Draft Report Senate Bill 350 Doubling Energy Efficiency Savings by 2030

Rising Sun Energy Center (“Rising Sun” hereafter) respectfully submits these comments in response to the California Energy Commission (CEC) Draft Report *Senate Bill (SB) 350 Doubling Energy Efficiency Savings by 2030* presented at the Joint Agency Workshop on SB 350 2030 Energy Efficiency Savings Doubling Targets on September 7, 2017.

Rising Sun Energy Center is a workforce development organization that provides green training and employment opportunities to youth and to low-income adults, and that offers free energy efficiency and water conservation assessments, installations, and education to renters and homeowners in six Bay Area and Central Valley counties.

Rising Sun agrees with the observations and conclusions made in the Draft Report, and we appreciate the diligent efforts by CEC and its sister agencies to comprehensively implement SB 350. We value our engagement in the process thus far, and the opportunity to comment on the Draft Report. We offer comments for consideration in response to recommendations described in *Chapter 7: Recommendations* in the Draft Report.

### **Report Recommendation: Fund and Improve Energy Efficiency Programs (Page 52)**

- *Maintain or expand current levels of funding of financing programs, including the Water Energy Grant, LIWP, and Proposition 39, and others. Coordinate with state and local agencies that deliver energy efficiency programs and stakeholders (Page 52)*

Rising Sun supports extending funding for existing non-utility energy efficiency programs. The organization believes that the non-utility energy efficiency programs may be improved if “the incorporation of non-energy benefits into program evaluation and cost-effectiveness tests can place energy efficiency and renewable upgrades in the proper context, one in which infrastructural, environmental, and social benefits are part of the calculus for future energy policy.”<sup>1</sup> **Energy efficiency programs should evaluate co-benefits** such as resident health, safety, and comfort; counting the number of local family-sustaining jobs created; the number of local, low-income residents hired; the increase in pay for local, low-income residents; the reduction in utility costs; etc.

Rising Sun also recommends that existing **energy efficiency programs should also focus on minimizing barriers for program participation**. Often moderate-income and hard-to-reach customers (e.g., renters, non-native English speakers, disabled, seniors, etc.) do not qualify for low-income energy service programs, do not have the documentation to support the program entering their home, and cannot afford programs that lead to incentives like Advanced Home Upgrade. Rising Sun has learned how to minimize these barriers for energy efficiency program participation through the optimization of its California Youth Energy Services (CYES) program over the last 18 years. CYES is a direct install residential energy efficiency program deployed in six Bay Area and Central valley counties that serves single and multi-family households, renters and owners, targets hard-to-reach customers, and requires zero barriers to participation. All direct install services are provided by local youth hired from the community. In 2015, 73% of CYES customers lived in low-income and lower moderate-income households.

Key tactics that reduce barriers to participation include:

- Ensuring affordability
  - The service, called a Green House Call (GHC), is offered at no cost to all residents. In addition to addressing income restrictions, this also reduces barriers to property manager participation.
- Simplifying participation
  - There is no application process; customers need only set an appointment.
  - There are no eligibility requirements, other than being a ratepayer and not living in dwelling that was served in the last five years. All customers are eligible – single-family, multifamily, renter, homeowner.
  - There is no income verification or other documentation required.
  - No landlord permission is required, as all upgrades are non-structural. While this does mean that the savings are inherently limited, it can act as a foot-in-the-door, and we do provide information on accessing deeper weatherization programs, particularly for low-income customers.
- Reducing language barriers

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<sup>1</sup> Scavo, Jordan, Suzanne Korosec, Esteban Guerrero, Bill Pennington, and Pamela Doughman. 2016. Low-Income Barriers Study, Part A: Overcoming Barriers to Energy Efficiency and Renewables for Low-income customers and Small Business Contracting Opportunities in Disadvantaged Communities. California Energy Commission. Publication Number: CEC-300-2016-009-CMF.

- We work to hire outreach staff who speak multiple languages, and when we hire our youth, we ensure that the languages they speak mirror those of their community, so that Green House Calls can be conducted in languages other than English if needed.
- Integrating services
  - In addition to energy efficiency measures, CYES offers water conservation fixtures, city-specific recycling information, e-waste removal and recycling, and a basic solar assessment for single-family homeowners.
- Ensuring trust
  - Rising Sun’s status as a community-based nonprofit helps build customer trust.
- Providing direct community benefit
  - In addition to helping residents directly save energy and water, and lower their utility costs, CYES trains and employs local youth from those communities and provides meaningful, paid, early employment in the green sector, helping to develop the next generation of green leaders.

CYES and other local, regional, and statewide programs, and certainly a wealth of workforce, education, and training organizations, who have successfully overcome these barriers can serve as a model of how to minimize barriers for energy efficiency program participation.

#### **Report Recommendation: Develop Additional Energy Efficiency Programs (Page 52)**

- *Create new energy efficiency programs that capture additional savings in collaboration with utilities, state and local governments, and stakeholders. (Page 53)*

Rising Sun supports this recommendation and finds it vital to **first assess improving the accessibility, uptake, and utilization of existing programs and policy before adding new programs** that may further confuse the market, unless such programs truly represent a new and untapped opportunity that will directly address the barriers identified in the Low-Income Barriers Study, EBEE Action Plan, or other guiding resources. There are many deserving programs that, in being brought to scale, may provide one successful pathway to doubling energy efficiency savings.

Rising Sun also recommends that the State consider an **“Energy Efficiency Innovation Fund” that supports innovative solutions to more effectively achieve the goal of doubling energy efficiency savings by 2030**. Public grants may stifle the scope of project ideas and implementation strategies due to the degree it needs to be prescriptive. An “Energy Efficiency Innovation Fund” that simplifies the selection criteria could serve to identify effective and innovative strategies to address the State’s ambitious environmental goals and enhance California’s bustling innovation economy.

- *Expand the workforce training available to improve the quality of energy efficiency equipment installation, consistent with recommendations from the Low-Income Barriers Report and the EBEE Action Plan. (Page 53)*

Rising Sun supports this recommendation to expand and fund workforce training programs that improve the quality of energy efficiency equipment installation, but also suggests **expanding the program to improve the quality of energy efficiency equipment operation and maintenance**. Over the lifetime of the equipment, greater electricity and natural gas savings, greenhouse gas emission reductions, and air quality benefits are achievable by equipment that is operated optimally at maximal operational availability. Thus, it is critical to ensure that workforce training curriculum and programs train for equipment installation, operation, and maintenance to ensure that the State's 2030 targets are met and that public and private investments in energy efficiency in California are maximized.

The Existing Buildings Energy Efficiency Action (EBEE) Action Plan calls for "a certified, high-performing workforce...enabled to support California's energy efficiency industry" by 2020. It is critical to expand workforce training in equipment installation, operation, and maintenance immediately to reach the goal set by the EBEE Action Plan by 2020. The State, in collaboration with the energy efficiency industry, should **provide annual job demand projections that inform workforce training programs** on the number of workers that will need to be prepared for upcoming energy efficiency projects.

The State should be cognizant that a high-performing workforce enabled to support **California's energy efficiency industry is most reliable, knowledgeable, and effective when its employers, the energy efficiency industry, are equally supportive of its workforce**. Rising Sun's first workforce training program was focused on building energy efficiency. Unfortunately, the energy efficiency industry did not offer jobs with family-sustaining wages, benefits, job security, nor a career-pathway. The organization moved away from training low-income workers in energy efficiency and shifted to a pre-apprenticeship program that would assist low-income workers to enter building trade union apprenticeships. Unions ensure that workers will receive family-sustaining wages, benefits, and a career pathway, which results in economic sufficiency. It is pertinent that the energy efficiency industry creates economic sustainability for its workforce, which will directly affect the industry's effectiveness, output, and overall success in the State.

Lastly, the workforce training program should **broaden opportunities for workers from disadvantaged communities**, which is also recommended in the Low-Income Barrier Report and EBEE Action Plan. The energy efficiency industry can support this endeavor by partnering with workforce training programs servicing workers from disadvantaged communities, hiring these trained workers, and ensuring that companies implement thoughtful policies that encourage and support a work culture that thrives from a diverse workforce.

### **Report Recommendation: Reporting on Disadvantaged Communities (Page 54)**

- Work with utilities to determine and apply the best methods to ensure adequate reporting of energy efficiency impacts in disadvantaged communities, including whether simplified methods should be used initially while more definitive methods are developed and implemented.(Page 54)

Rising Sun supports this recommendation and finds it to be critical to ensuring disadvantaged communities have access to clean, affordable energy and benefit from the financial savings of energy efficiency measures. In addition, the State should require utilities and energy efficiency industry to **report the number of energy efficiency workers in disadvantaged communities** that are trained and hired; where these workers reside and work; worker's wages; and retention rate. This data will provide insight into the effectiveness of the programs to achieve economic and environmental equity.

Rising Sun Energy Center appreciates the CEC for its commitment to this topic and for the opportunity to comment and engage in this process.

Sincerely,

Jodi Pincus  
Executive Director  
Rising Sun Energy Center

### **About Rising Sun Energy Center**

Rising Sun is a nonprofit workforce development organization operating since 1994 that provides green job training and employment opportunities to youth and low-income adults, and that offers free residential energy efficiency and water conservation assessments, installations, and education to renters and homeowners in six Bay Area and Central Valley counties. Rising Sun runs two primary programs: California Youth Energy Services (CYES), which employs local youth to provide Green House Calls in their communities, and Green Energy Training Services (GETS), a pre-apprenticeship training, case management, and job placement program that prepares low-income adults who experience barriers to employment for careers in construction, energy efficiency, solar, and the building trades.