

DOCKETED

Docket Number:	17-IEPR-01
Project Title:	General/Scope
TN #:	221730
Document Title:	Comments of the BayREN re Draft 2017 Integrated Energy Policy Report
Description:	N/A
Filer:	System
Organization:	Bay Area Regional Energy Network (BayREN)
Submitter Role:	Public
Submission Date:	11/13/2017 3:20:54 PM
Docketed Date:	11/13/2017

Comment Received From: Jennifer Berg

Submitted On: 11/13/2017

Docket Number: 17-IEPR-01

Comments of the BayREN re Draft 2017 Integrated Energy Policy Report

Additional submitted attachment is included below.

November 13, 2017

Chairman Robert B. Weisenmiller
IEPR Lead Commissioner
Commissioner Andrew McAllister
Energy Efficiency Lead Commissioner
California Energy Commission
Dockets Office MS-4
Re: Docket No. 17-IEPR-01
1516 Ninth Street
Sacramento, CA 95814-5512
docket@energy.ca.gov

Re: Docket No. 17-IEPR-01

Dear Chairman Weisenmiller and Commissioner McAllister:

The Bay Area Regional Energy Network (BayREN) appreciates the opportunity to comment on the California Energy Commission (CEC)'s Staff Workshop on the Draft 2017 Integrated Energy Policy Report (IEPR) on October 23, 2017. The BayREN is a regional initiative of the Association of Bay Area Governments (ABAG) and the Metropolitan Transportation Commission (MTC) and is composed of public agencies in the nine-county Bay Area. BayREN designs and implements effective energy saving programs, and draws on the expertise, successful regional and local climate, resource, and sustainability programs. The BayREN provides the regional infrastructure needed for the efficient delivery of energy efficiency programs through the Bay Area. Our specific comments follow.

Draft Report Clarifications

BayREN requests clarifying changes to the Draft Report as detailed below.

- Chapter 2 of Draft Report discusses California “Doubling Energy Efficiency Savings”, including Utility and Non-Utility efficiency targets and goals and associated Utility and Non-Utility programs. BayREN raises a general concern that the CEC’s categorization of utility-based versus nonutility-based programs does not offer a sufficiently detailed framework for the nuanced landscape of energy efficiency program administrators.
 - As CCAs and RENs administer an increasing number of efficiency programs, including programs funded by IOU rate payers as well as programs funded by other sources, the current categorization in the Report is limiting. CCAs and RENs have multiple energy goals including locally directed and mandated energy efficiency, renewable energy efficiency targets, climate action planning goals and economic development goals. For example, discussion on Page 53 of the Report and in Figures 10 and 11 on Page 54 (“The statewide cumulative energy efficiency savings targets for electricity and natural gas, along with projected savings from utility and non-utility programs, are represented in Figures 10 and

11.”) limits IOU energy efficiency savings targets those identified in the CPUC’s potential and goals studies, which to date have not yet been scoped to address how the broader CCA and REN energy goals discussed above impact IOU energy efficiency goals.

- BayREN has commented in CPUC proceedings for the Potential and Goals Study that future Studies need to reflect the nuanced landscape of current and future program administrators. BayREN believes the IEPR Report will be more useful if it can similarly adjust its framework of Utility and Non-Utility programs. This adjustment would require significant rewriting of this section of the IEPR Report; BayREN requests guidance from the Commission to understand how to contribute to potential adjustments.

- On Table 2 on Page 57, BayREN recommends including local municipal water-utility on-bill programs that include energy efficiency measures and deliver water-energy nexus savings in the “Financing” program category: Windsor Efficiency PAYS® and Green Haywards PAYS®.

We appreciate the opportunity to provide this input, and thank CEC for its careful consideration of BayREN’s comments.

Respectfully Submitted,

Jennifer K. Berg
Principal Program Manager