

DOCKETED

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On the 2019 Integrated Energy Policy Report Scoping Order

Additional submitted attachment is included below.



February 28, 2019

Via Electronic Delivery

California Energy Commission
Docket Unit, MS-4
Re: Docket No. 19-IEPR-01 – 2019 Scoping Order
1516 Ninth Street
Sacramento, CA 95814-5512

**RE: Ygrene Energy Fund Comments on the 2019 Integrated Energy Policy Report
Scoping Order – Docket No. 19-IEPR-01**

Dear Commissioner Scott and Energy Commission Staff:

California has long held the mantle as the nation's most innovative and committed state with regard to renewable energy and energy efficiency policy. As a California company dedicated to bringing renewable energy, energy efficiency, and resiliency market solutions to bear on the challenges related to climate change, Ygrene Energy Fund welcomes the opportunity to provide comments to the 2019 Integrated Energy Policy Report – Scoping Order.

Ygrene is encouraged to see the Energy Commission's continued focus on Energy Equity and Energy Efficiency in meeting Senate Bill 350 (de Leon, Chapter 547, Statutes of 2015) requirements that California double its energy efficiency savings and produce 50% of the State's electricity from renewable sources by 2030. In order to achieve these policy goals, retrofitting California's existing building stock is essential. California property owners need accessible policy tools in order to retrofit their buildings to reduce energy consumption, produce renewable electricity, and reduce their carbon footprint.

Providing equitable access to renewable energy and energy efficiency technologies for California property owners is paramount in meeting SB 350's goals. And, affordable financing is vital to providing equitable access to these technologies. It is widely known that high upfront costs (first cost barrier) is one of the most restrictive factors when it comes to property owners investing in energy efficiency, renewable energy, and water conservation technologies. As the Energy Commission notes, financing is the third most impactful policy behind utility programs and codes and standards in achieving the efficiency doubling goal called for in SB 350.¹ Thus, Ygrene encourages the Energy Commission to address financing's contribution to meeting these goals, with a particular focus on Property Assessed Clean Energy (PACE) financing in the 2019 Integrated Energy Policy Report.

Since passing the first PACE enabling legislation in the country in 2008,² California has fostered the largest PACE market in the country, accounting for over 80% of national PACE financing,

¹ CEC 2018 Integrated Energy Policy Report Update Volume II, Figure 3, pg. 53

² California Assembly Bill 811 (Levine and Beall, Chapter 159, Statutes of 2008).



representing over \$5 billion in clean energy capital investment. California's PACE market has had a tremendous impact on energy efficiency, renewable energy, and water conservation, leading to billions of kilowatt hours saved, hundreds of megawatts of distributed solar electric capacity, billions of gallons of water conserved, and millions of metric tons of carbon abated.

PACE is an effective public policy tool available to property owners to make improvements that reduce energy and water consumption and produce distributed renewable energy, helping California meet its goals under SB 350. Therefore, the scope of the 2019 IEPR should address the impact that financing has in meeting these goals, especially PACE financing.

Thank you for your consideration of the above comments and we look forward to further participation in the 2019 IEPR process.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Lemyre", with a stylized flourish at the end.

Mike Lemyre
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