

**DOCKETED**

<b>Docket Number:</b>	19-IEPR-06
<b>Project Title:</b>	Energy Efficiency and Building Decarbonization
<b>TN #:</b>	227449
<b>Document Title:</b>	Don Wood Comments - 2018 IEPR Update Comment
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Don Wood
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	3/28/2019 1:38:30 PM
<b>Docketed Date:</b>	3/28/2019

*Comment Received From: Don Wood  
Submitted On: 3/28/2019  
Docket Number: 19-IEPR-06*

## **2018 IEPR Update Comment**

I think we need this IEPR to separate energy efficiency from building decarbonization. EE is all about making building so efficient that they use less energy to run, perhaps getting them down to net zero energy demand or better.

Decarbonization to me means trying to tear out natural gas furnaces of all existing homes that have gas furnaces, and replacing them with an electric heating system. We all want to get rid of fossil fuels, but right now, all electric homes use more net energy to heat homes than gas furnaces do, SDG&E has among the highest electricity rates in the nation and it likely for now that some of the electricity needed to run all the new electric home heating systems will come from natural gas generation plants, which pump out carbon.

So I believe that the IEPR process should address energy efficiency on a stand alone basis, and not mix it up with things like demand management or building decarbonization. That would ensure that resources needed to invent and produce real EE technologies like hyper efficient air conditioning systems and ultra-weatherization of larger middle to high income homes, is not diverted to more problematic concerns.

This IEPR also needs to take a very hard look at the CPUC Energy Divisions Frankenstein monster, its Energy Upgrade California "branding campaign" which has diverted many hundreds of millions of dollars in utility ratepayer money earmarked for programs that produce measured energy savings into its silly branding campaign that aims to improve the image of the CPUC and its energy division. For example, until PG&E recently announced that it is pulling its ratepayer EE funds out of Energy Upgrade California as the utility heads into bankruptcy, the energy division planned to spend \$130 million in ratepayer money on EUC TV advertisements like the current one running that talks about who will inherit the state. The only connection to energy efficiency I could see in the ad was a video shot of the San Simeon castle, with a voiceover telling us to turn off the lights when we leave. Even that segment of the video ad has been cut out of shorter versions of the ad still playing.

I don't see how the energy division plans to measure or evaluate any electricity or natural gas savings produced by that \$130 M. TV ad. campaign.

After fully examining the way the energy division has diverted money meant to save measurable amounts of energy into its own misadventures, I hope that the IPER recommends that the ED get out of the business of designing and running its own ratepayer funded "programs" and go back to what it did in the 1990s, when ratepayer funded EE programs were at their most productive. Authorize utilities to collect ratepayer money for new programs and set very clear and measurable energy savings goals. Allow utilities to contract out part of the work to local community agencies and private contractors, but hold the utilities directly accountable for meeting or exceeding program energy savings. The CPUC and its Energy Divisions job is to

regulate and oversee utility energy efficiency programs, not get into the business of designing and running programs themselves. Otherwise, how can the CPUC hold the utilities responsible when the Energy Division's programs crash and burn? How can the Commission fine or otherwise punish its own energy division when programs fail?

As I said, this is an issue this IPER needs to closely examine.

Don Wood, Senior Policy Advisor  
Pacific Energy Policy Center  
619-463-9035  
Dwood8@cox.net