

DOCKETED

Docket Number:	23-DECARB-01
Project Title:	Inflation Reduction Act Residential Energy Rebate Programs
TN #:	260818
Document Title:	Los Angeles Dept of Water and Power Comments - Any potential partnerships with municipal Utilities
Description:	N/A
Filer:	System
Organization:	Los Angeles Dept of Water and Power
Submitter Role:	Public Agency
Submission Date:	12/24/2024 12:02:48 PM
Docketed Date:	12/24/2024

*Comment Received From: Los Angeles Dept of Water and Power
Submitted On: 12/24/2024
Docket Number: 23-DECARB-01*

Any potential partnerships with municipal Utilities

Are there plans for CEC (or its program implementer Energy Solutions) down the road to coordinate with municipal utilities (MU) in the implementation of HOMES and HEEHRA programs? From our point of view, here are some advantages to collaborating with MUs on the implementation and rollout of these programs. It would maximize residential energy efficiency upgrades, provide lower bills and capture energy savings, and use shared data which MUs can use for their energy savings and other performance metrics reporting to state and federal agencies. For another, while these electrification measures will increase energy efficiency, improve grid flexibility, and support building decarbonization across the residential space, data shared about the increased electrical loads generated by these electrification measures may greatly assist MUs in their resource planning process, specifically load forecasting to account for increased adoption of demand-side measures in the form of energy efficiency and electrification. Third, we are concerned with attribution of savings for programs that braid or stack federal rebate funding. Perhaps the CEC might adopt clear savings attribution frameworks to encourage greater MU engagement. Finally, we feel CEC or its agents and MUs might work together on how to adjust performance metrics, including annual energy savings and performance incentive mechanisms. MUs would like to have clarity regarding how the coordination and co-funding of energy efficiency and electrification programs will be addressed by CEC. MUs would like to know how they can leverage these wonderful IRA-funded CEC administered measures for the greatest benefit to customers while also ensuring MUs are greatly positioned to address increased electrical loads with accurate load forecasting and obtain energy savings data for reporting requirements, among other state/federal mandated requirements.