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August 4, 2009

To: California Energy Commission Ad Hoc Committee
Chairperson Douglas
Commissioner Rosenfeld

From: Chris Brown, Executive Director, California Urban Water Conservation Council

Re: Comments on the Energy Efficiency and Conservation Block Grant (EECBG) Program Guidelines

The mission of the California Urban Water Conservation Council is to improve water use efficiency statewide. The Council was created to oversee the 1991 *Memorandum of Understanding Regarding Urban Water Conservation in California* (MOU), which sets forth Best Management Practices (BMPs) for the efficient use of water in urban areas of the state. The Council and the MOU that created it represent a unique approach to urban water conservation through collaboration between water agencies, regulators, public interest groups, and other interested organizations. The Council's 411 member organizations include 233 water supply agencies that deliver nearly 80 percent of California's urban water; 35 environmental groups; and 143 other organizations interested in water efficiency issues.

Increasingly, the focus of the Council and its member agencies are focusing not only on water savings, but the associated energy savings of its programs. Energy is required for water pumping, treatment, and distribution, consuming approximately 20 percent of State's total electricity and 30 percent of our natural gas. If consumer end use is included that boosts the totals to 19 percent of the electric energy load in CA and 39 percent of our natural gas energy load. With this in mind, the Council respectfully requests that the EECBG Program Guidelines be broadened slightly to place additional emphasis on the potential energy savings associated with what are often considered solely water conservation programs.

Following are our suggested revisions to the EECBG Guidelines. Thank you for your consideration.

Page 7:

"Typically, the most cost-effective projects include, but are not limited to: ...
Water/wastewater system process and control retrofits"

This listing does not include end-user retrofits that would result in water savings as well as direct energy associated savings (heated water) and indirect energy savings (pumping



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and transporting water). The inclusion of direct-install appliances and equipment could broaden the scope of this listing of most cost-effective projects.

Page 8:

"Eligibility: Applicants may collaborate with each other to share and leverage their internal resources. The lead collaborator, with written authorization from the other collaborating applicants, may apply for and receive a funding award on behalf of all collaborating applicants. The lead collaborator may be an eligible applicant, or other public or nonprofit agency."

Another category for projects that can achieve statewide benefits could be added to the list. That way, organizations such as the Council could take advantage of the broad spectrum of members across the state, especially small cities and counties, making programs available and affordable that might not be so to them individually.

Page 8 & 9:

Eligible Projects: Examples

The CEC lists lighting, mechanical and controls projects. Another category entitled "retrofits" that includes water and energy saving devices, equipment and appliances would highlight the efficiency potential of these types of projects.

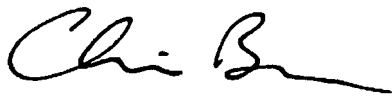
Page 9:

Direct Equipment Purchase Project Option

"...eligible applicants may choose to use their funding awards to make a direct purchase of pre-selected energy efficiency measures equipment, preselected by the Energy Commission."

Attachment B Direct Energy Efficiency Equipment List, should include water and energy efficiency equipment or appliances, such as high efficiency washing machines.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Brown", with a stylized, flowing script.

Chris Brown, Executive Director