

**Comments on the Preliminary State Energy Program Guideline
for the California Energy Commission**

California Energy Commission
1516 Ninth Street, MS-29
Sacramento, CA 95814-5512

Thank for the opportunity to comment on the Preliminary State Energy Program Guidelines. Our comments are brief and focus on supporting the development of a comprehensive home energy efficiency audit and retrofit marketplace.

Municipal Financing District Program

We request that energy efficiency audits are a requirement for any home which participates in an AB 811 program that receives State Energy Program (SEP) funds. Additionally we request at least 20% of dollars spent on a Renewable Energy System be applied towards a Home Energy Efficiency Retrofit.

The CEC Guidelines for CA Solar Incentive Programs states that, "by January 1, 2008, the commission... shall require reasonable and cost-effective energy efficiency improvements in existing buildings as a condition of providing incentives for eligible solar energy systems." Although the intention was apparent in the statement the desired outcome in the market has been and is continuing to be ineffective.

Home energy audits with HERS ratings play an essential role in providing a roadmap for homeowners to make smart choices. An energy retrofit roadmap from a home energy audit and a requirement for dollars to be spent on whole-house solutions will increase the demand for home energy retrofit solutions and a robust home energy workforce.

California Comprehensive Residential Building Retrofit Program (CCRBR)

The evaluation criteria listed first for the CCRBR is leveraging of Funding. Some programs that may be leveraged include EECBG, NSP I, NSP II, CDBG, Green Jobs Programs, Rehabilitation Loan and Grant Programs. Within a consortia of cities the types of programs available to augment vary greatly from city to city.

We request that flexibility be granted such that the consortia may be spread over a significant region. Additionally we request that within one proposal a variety of projects be submitted as to support the creation of the home energy efficiency market locally.

Although larger projects contribute to the ease of the administration of the SEP, local programs and projects that augment NSP acquisition, rehabilitations and home grant programs create a great opportunity for the integration of energy efficiency into local governments. We request proposals for programs for as little as \$1,000,000 be considered.

For any question or requests for additional information, please contact Spencer Rosen at 858.345.1658 or srosen@greenerdawn.com

Sincerely,
Spencer Rosen, Business Development
Greener Dawn

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