

To: Commissioners, California Energy Commission
Re: Docket Number 09-OII-1 Order Instituting Informational Proceeding –
American Recovery and Reinvestment Act

Commissioners,

with the comment period closing on the EECBG Guidelines for Small Cities and Counties, and in light of Beutler's longstanding relationship with many small municipalities around the state, we wish to make the following comments on the draft guidelines.

First, the professionalism and dedication of your staff is evident in the thoughtful, comprehensive and fair concepts demonstrated in the guidelines. The following few comments are a testament to the fact that there are only a few comments around the edges of the major findings in the guidelines that we wish to discuss.

We also wish to echo the comments that were made at the July 15th hearing, including those by Commissioner Rosenfeld, on the importance of peak energy in California. The concept of dynamic values to kWh consumption for every hour out of the year is reality. That peak energy has a greater amount of embedded source energy is the basis of many California initiatives over the last decade, including both the CPUC/E3 avoided cost calculator and Title-24's Time Dependent Valuation. Because the linkage between hourly source energy and kWh is so well known, we urge the commission to consider proposals that are submitted using TDV as the metric instead of "pure" kWh. At minimum, scoring criteria should take into account the TDV energy of the proposal. A set of LED exit signs that save 1,000 kWh per year on an 8760 basis and an HVAC measure that saves 1,000 per year solely on peak afternoons have a different impact in our state.

We also encourage final scoring criteria for competitive programs to give special consideration to California jobs. All projects may be valued on the straight \$92,000/job basis, but those proposals that have explicitly tied their proposals to longer term and sustainable job creation programs, such as those through the Workforce Investment Act, are more certain to produce the jobs impact that we all seek. Similarly, proposals that focus upon technologies that are actually manufactured in California should also receive special consideration, especially when compared to those which purchase equipment from outside the state or even outside the country.

If the scoring criteria echo what all of us in the energy policy realm have collectively worked on for so long, this opportunity will live up to its promise of delivering transformative change to energy efficiency measures in our state.

Yours,

Michael Day
Division President
Beutler Energy Services & Technology Company (Bestco)

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