

July 19, 2011

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 11-IEP-1A
1516 Ninth Street
Sacramento, CA 95814-5512

c: Heather Raitt, CEC
Matthew Tisdale, CPUC

DOCKET	
11-IEP-1A	
DATE	JUL 19 2011
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SUBJECT: Docket number 11-IEP-1A, California Clean Energy Future

To the Assigned Commissioners and IEPR Staff Director:

This brief comment concerns only the current proposed IEPR goals on net-zero energy efficiency savings to be reached by 2020, as outlined in the staff presentation web-posted as [http://www.energy.ca.gov/2011_energypolicy/documents/2011-07-06_workshop/presentations/CCEF July IEPR Overview and Metrics v14.pdf](http://www.energy.ca.gov/2011_energypolicy/documents/2011-07-06_workshop/presentations/CCEF_July_IEPR_Overview_and_Metrics_v14.pdf).

That presentation dealt only incidentally with energy efficiency; the only mention was on Slide 6 indicating the staff's proposed 2020 goals for therm and MW savings. The derivation of those goals and the base year were not specified in the presentation or staff paper. The goals appear to cover only new buildings.

This comment filing makes only one simple point: Existing buildings should be addressed in more detail in this IEPR. Buildings in existence today will dominate California's building stock and energy savings potential in 2020 and decades beyond. In fact, at a roughly <2% annual rate of new housing construction, deep energy savings opportunities in already existing buildings by 2020 will be many times greater than those possible through even the most optimistic trajectory of zero-energy new buildings.

The CPUC has recognized this in its California Energy Efficiency Strategic Plan¹ by setting a target of 40% energy savings in existing buildings by 2020. The CEESP goes farther, anticipating that such a goal will likely require a quarter of all California buildings to reach a 75% savings level. This statewide retrofit goal is far beyond that cited for new zero-energy buildings in the CEC staff presentation. It also requires millions of homes and other buildings to have very deep energy retrofits, easily extendable to zero through onsite renewable generation.

¹ http://www.cpuc.ca.gov/NR/rdonlyres/A54B59C2-D571-440D-9477-3363726F573A/0/CAEnergyEfficiencyStrategicPlan_Jan2011.pdf



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Acknowledging the high potential for deep savings in existing buildings in the IEPR would demonstrate far greater overall programmatic impact as well as strong inter-agency coordination of planning and program initiatives.

Thank you for this opportunity to offer comments. I look forward to further IEPR participation.

With best regards,

Robert L. Knight, President
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