

March 4, 2014

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 14-IEP-01
1516 Ninth Street
Sacramento, CA 95814-5512
VIA EMAIL (docket@energy.ca.gov)

California Energy Commission

DOCKETED

14-IEP-01

TN 72743

MAR 04 2014

RE: CALIFORNIA ENERGY EFFICIENCY INDUSTRY COUNCIL'S COMMENTS ON THE CEC'S DRAFT 2014 INTEGRATED ENERGY POLICY REPORT UPDATE SCOPING ORDER

I. INTRODUCTION

The California Energy Efficiency Industry Council (Efficiency Council) appreciates this opportunity to provide comments on the California Energy Commission's (CEC) *Draft 2014 Integrated Energy Policy Report Update Scoping Order (2014 IEPR Update)*. We commend the work and leadership of the CEC Commissioners and staff on the critical issues outlined in the draft scope and schedule for the *2014 IEPR Update*, particularly the focus on the implementation of the *Energy Efficiency Program for Existing Buildings (AB 758)*, as well as the CEC's willingness to continue to address California's electricity planning and procurement issues. These issues will be key to continue to push toward meeting California's energy and climate goals.

The Efficiency Council is a statewide trade association of non-utility companies that provide energy efficiency and demand response services and products in California.¹ Our member businesses employ many thousands of Californians throughout the state. They include implementation and evaluation experts, energy service companies, engineering and architecture firms, contractors, financing experts, workforce training entities, and manufacturers of energy efficiency and demand response products and equipment. The Efficiency Council's mission is to support appropriate energy efficiency and demand response policies, programs, and technologies that create sustainable jobs and foster long-term economic growth, stable and reasonably priced energy infrastructures, and environmental improvement.

As a voice for the efficiency industry in the state, and on behalf of companies and organizations that design, implement and evaluate energy efficiency and demand response programs and services in California, the Efficiency Council has a strong interest in the scope of the *2014 IEPR Update*. The Efficiency Council and its members were active participants throughout the 2013 IEPR process, including engagement with the Energy Commission and stakeholders on the development of the AB 758 Draft Action Plan. During that engagement process, the Efficiency Council presented a number of key points

¹More information about the Efficiency Council can be found at www.efficiencycouncil.org.

that we would recommend the Energy Commission consider as part of the AB 758 implementation component of the *2014 IEPR Update*. These are:

- There should be numerical energy savings targets and timelines associated with AB 758 goals
- Creating customer demand for energy upgrades should be priority #1 for AB 758 efforts. This can be achieved through a combination of voluntary and mandatory approaches, including:
 - Building benchmarking
 - Energy performance ratings
 - Building labeling and disclosure
 - Reduction of consumption for plug loads
- Mandatory approaches, such as those listed above, should be considered immediately for state and municipally-owned buildings
- Safe and secure access to energy performance data needs to be readily available to market participants
- AB 758 programs and initiatives need to take a customer-centric approach that creates a long-term relationship and "energy action plan" with customers and buildings
- The CEC should continue to leverage and coordinate with efforts already under way by the IOUs, POU's, CARB, etc. This includes Prop 39, Cap-and-trade revenue investment, and the CPUC-regulated energy efficiency programs.

Additionally, the Efficiency Council strongly supports the CEC's inclusion of an assessment of California's electricity infrastructure planning and procurement challenges in the *2014 IEPR Update*. The State is facing a number of electricity infrastructure and reliability issues, especially in light of the permanent closure of the San Onofre Nuclear Generating station (SONGS). A major component to ensuring success in addressing these issues is continued cooperation amongst the various state agencies that play a role in energy planning and procurement, including the CEC, CPUC, CAISO and CARB. Stronger coordination among these agencies will continue to improve the ability for preferred resources, such as energy efficiency and demand response that sit on top of the State's loading order, to help to meet California's electricity needs.

The Efficiency Council looks forward to engaging actively with CEC Commissioners, staff and other key stakeholders throughout the *2014 IEPR Update* process. As a representative voice of members of the energy efficiency and demand response industry, the Efficiency Council understands and appreciates the vital role that the IEPR serves to help accomplish our State's energy and climate goals. The energy efficiency industry stands ready to support State policies and programs that increase energy productivity while helping California's consumers and businesses realize long-term energy and cost savings.

Regards,



Margie Gardner, Executive Director