

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



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Order Instituting Rulemaking Concerning
Energy Efficiency Rolling Portfolios,
Policies, Programs, Evaluation and
Related Issues.

Rulemaking 13-11-005
(Filed November 21, 2013)

OPENING COMMENTS OF THE COUNTY OF SAN MATEO ON ADMINISTRATIVE
LAW JUDGE'S RULING SEEKING COMMENT ON FUTURE OF REGIONAL ENERGY
NETWORKS

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Dated: April 16, 2019

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Introduction

Pursuant to the March 27, 2019 Administrative Law Judge’s Ruling Seeking Comment on Future of Regional Energy Networks (the Ruling), and in accordance with Rule 6.2 of the Commission’s Rules of Practice and Procedure, the County of San Mateo respectfully submits these Opening Comments.

These Opening Comments provide an example of how local county implementors of Regional Energy Networks (RENs) effectively coordinate locally with Community Choice Aggregators (CCAs) and Local Government Partnerships (LGPs) to fulfill multiple state initiatives: AB 32, SB 350, AB 802, and AB 758. Improving energy efficiency (EE) in multiple sectors, reducing greenhouse gas emissions, educating about financing resources, supporting compliance with the energy code, reach code development, and climate action planning, are all being implemented locally in San Mateo County through an intentionally-coordinated collaboration of these programs.

The Commission should clearly understand the value of REN programs in the communities they serve outside of cost effectiveness, especially their achievement of environmental goals. We believe that this can only be achieved, given the lack conclusive

evaluation results, by the Commission holding workshops to allow Commission staff to more clearly understand activities and results in communities served.

For purposes of providing a local perspective on coordination, we provide responses to the first two questions posed in the Ruling, below.

Questions posed in ruling

1. Threshold REN Policy. Are RENs still appropriate (new or existing) in light of likely geographic overlap, and/or portfolio overlap, with CCAs and LGPs? Why or why not? What unique value do RENs bring, if any, compared to CCA or LGP programs?

RENs regional approach and programs provide consistency and scale, and fill unique program needs. In the Bay Area, ABAG provides administration, and local counties support coordination. This model allows local counties to focus on targeted, local implementation of BayREN program offerings. This “central” administration and coordination model provide an opportunity for innovation and development of program approaches that can leverage systems thinking to improve local and regional outcomes.

It is our understanding that most CCAs have little interest in leveraging Public Good Funds. CCAs focus first on development of clean electricity for the communities they serve at a competitive cost to consumers, and then efforts to deploy distributed energy resources and policy to promote electrification but not necessarily efficiency. These efforts have just begun to deliver greenhouse gas emission reductions. This focus greatly limits any potential overlap between REN and CCA programming, and ratepayer funds are appropriate for these activities.

LGPs have suffered significant budget cuts as the IOUs focus on TRC. LGPs continue to serve an important role in public sector and community energy efficiency, for schools and

public-sector buildings, and in providing connectivity between all programs and their communities. In addition, LGPs uniquely provide energy and climate action planning.

More specifically in San Mateo County, the following are examples of how these three programs coordinate and collaborate towards outcomes:

- PCE is invited to present monthly at LGP-funded (San Mateo County Energy Watch (SMCEW)) Regionally Integrated Climate Action Planning Suite (RICAPS) meetings. These meetings focus on climate action plan implementation, local program coordination, and messaging to our 20 cities about sustainability and energy efficiency opportunities. PCE often presents and leverages connections made at meetings to advance their local initiatives.
- PCE has leveraged Office of Sustainability and staff to help run three of their new local pilots, grant funded by PCE. Programs include creating Climate Action Plan measures, which are being added to the RICAPS suite of tools for local governments, focused on electrification; advancing electrification reach codes; and reducing GHG emissions of municipal fleets. The primary person working on these pilots is funded through BayREN (outside of these projects). The outcomes help inform BayREN programs, just as they are enhancing LGP tools to local governments.
- BayREN has added capacity to Office of Sustainability by ensuring at least one full time person working on energy projects.
- PCE has leveraged resources created and events hosted by BayREN Codes & Standards program to advance local reach code efforts, in alignment with Commission goals. PCE modeled its reach code website after BayREN's, received expertise from

the BayREN Program Manager, leveraged the 2019-Q1 Forum as part of a reach code campaign, and coordinated with BayREN to make sure processes aligned with regional efforts while providing a more targeted effort locally.

- PCE has been invited to all Single Family (SF) and Multifamily (MF) workshops hosted in San Mateo County. PCE often presents about their local programs and organization. BayREN plans workshops, including paying for refreshments, conducting outreach, securing workshop locations. PCE is able to simply show up to planned events and have a ready audience with which to share information.
- BayREN SF outreach team shares PCE outreach collateral at tabling events in the community and with at large employers.
- A LGP-funded, Energy and Water Saving Toolkit in SMC libraries has PCE information in its handbook alongside BayREN SF program information.
- BayREN has contacted all MF accounts to inform property owners of PCE's MF Electric Vehicle Charge Infrastructure program
- BayREN staff have shared local outreach best practices with PCE including connecting PCE to community organizations, outreach tools (i.e. Faraday), and to County social media pages.

All the above are examples of how the local BayREN program, PCE, and the LGP (SMCEW) coordinate in San Mateo County.

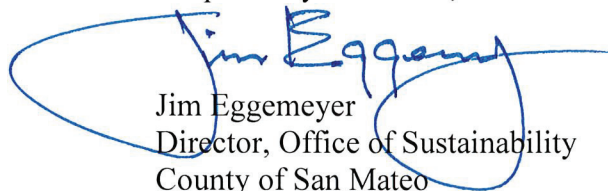
2. Existing REN policy. Should the Commission consider cancelling REN programs after the expiration of the current business plan period? Why or why not?

The Commission should continue to work with and evaluate the RENs as they proactively adjust their programs to continuously improve their effectiveness in serving state and local goals. REN programming with regional ABAG administration has been an important complement to the local LGP and CCA program. BayREN has demonstrated its ability to fill gaps, address hard to reach audiences, or provide programs the IOUs will not, and provide access to affordable EE solutions in San Mateo County. Cancelling these efforts would be premature. Though there is great confidence being placed on outcomes of completely new and unproven third-party programs. Given the timing, we do not believe it would be prudent of the Commission to cancel REN programs.

Conclusion

In San Mateo County, the local REN program, LGP and CCA coordinate with little to no overlap in programs, as a result of funding sources, program priorities, and successful coordination and collaboration. The Commission should make further efforts to understand how these programs coordinate at the local and regional levels and not consider cancellation of REN programs, especially in this juncture of the BP rollout process.

Respectfully submitted,



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