

TO: California Energy Efficiency Coordinating Council

FROM: Anna Lowe, Associate Regional Energy/Climate Planner
San Diego Association of Governments

DATE: November 16, 2016

SUBJECT: Statewide Local Government Partnership Energy Efficiency Business Plan Proposal

The San Diego Association of Governments (SANDAG) appreciates the forum the California Energy Efficiency Coordinating Council (CAEECC) provides for local governments to participate and stay abreast on energy efficiency topics directly related to our programs and funding. At this time, we would like to submit comments and ask questions about the “Statewide Local Government Partnership Energy Efficiency Business Plan Proposal” (Proposal).

The San Diego region has a total of five (5) local government partnerships (LGPs): the cities of Chula Vista and San Diego, County of San Diego, Port of San Diego, and SANDAG. The SANDAG LGP was established in 2010 and provides funding and services to sixteen (16) of the nineteen (19) SANDAG member agencies that don’t have direct LGPs with San Diego Gas & Electric (SDG&E) through the Energy Roadmap Program. All sixteen cities have completed Energy Roadmaps or Energy Management Plans and many of them have begun implementing them.

SANDAG has reviewed the Proposal and has the following comments/questions:

1. Program Design

The Proposal describes the need for more participation by LGPs in the design and implementation of energy efficiency (EE) programs; however, SDG&E does allow for LGPs to coordinate and collaborate on the development of unique and/or tailored scopes of work that better serve the constituency of each LGP, while supporting SDG&E’s core programs. It is important to highlight challenges and successes each of the different LGPs are faced with within each of the different Investor Owned Utility (IOU) territories without generalizing so much so that territories are not mischaracterized.

Further, the San Diego region, through the San Diego Regional Energy Partnership (SDREP) and the Emerging Cities Program, have a number of cross-jurisdictional opportunities available to interested cities, businesses, and residents. These programs are unique and could be used as a model throughout the state.

2. Data Access

The Proposal describes an ideal framework for consistent access to data. One of the current challenges facing all program implementers surrounds the current privacy requirements approved and regulated at the California Public Utility Commission (CPUC). *The Proposal should include clarity about what and how the proposed Statewide LGP Program Administrator (PA) will overcome the current regulatory requirements.*

3. Equitable Representation

As has been mentioned numerous times in multiple forums, the San Diego region, among many others, is not within close proximity to either the CPUC (San Francisco) or

the Capitol and LGC (Sacramento). This is cause for concern for a number different reasons:

- Inability for staff and/or other interested parties to participate in consistent face-to-face meetings and regulatory activities.
- Lack of familiarity with regional issues, politics, demographics, and other relevant components to effective program design and implementation.
- Little understanding of local programs, players, and successes.

One example of how the San Diego region was overlooked is in the Proposal itself. Appendix B: Administration and Marketing and Outreach Budgets of **all** LGP Programs, completely omitted any reference of any of the SDG&E LGPs. This error reinforces the concern for fair and equitable representation for all LGPs by a potential Statewide PA. *The Proposal should include a discussion about what and/or how the PA will ensure representation will be equitable and fair for all LGPs throughout the state.*

4. Ratepayer Contributions by IOU Territory

Ratepayers within each IOU territory have a line item on their bills, the majority of which, less those directed to things like EM&V and the Statewide Energy Efficiency Collaborative (SEEC), fund programs available to said ratepayers. *The Proposal should describe where and how the majority of ratepayer funds collected within an IOU territory will be spent. In other words, will funds paid by SDG&E territory ratepayers only be available to SDG&E ratepayers via EE programs or will they be rolled up into a statewide budget and then reallocated based upon criteria developed by the Statewide LGP PA?*

5. Senate Bill 375 Sustainable Communities and Climate Protection Act (SB 375)

SANDAG agrees with the value and relevance of including SB 375 in the list of “State Goals, Strategies and Objectives” (page 25); however, the way with which it was described does not align with the law. A more accurate description should focus on the requirements of what Metropolitan Planning Organizations (MPO) are required to consider when preparing a Sustainable Communities Strategies to achieve per capita greenhouse gas emissions from passenger vehicles through integrated land use and transportation planning. *Please consider refining your reference to SB 375 to be consistent with state law.*

Thank you for the opportunity to share our comments and questions. Please do not hesitate to contact me with any questions or comments.

Sincerely,

Anna Lowe

Associate Regional Energy/Climate Planner

San Diego Association of Governments

Phone: (619) 595-5603

Email: anna.lowe@sandag.org