

Via E-mail: docket@energy.state.ca.us, renewable@energy.state.ca.us

October 23, 2012

California Energy Commission  
Dockets Office, MS-4  
1516 Ninth Street  
Sacramento, CA 95814-5512

Re: Sunrun comments: docket number 12-EBP-1 - "Comprehensive Energy Efficiency Program for Existing Buildings (AB 758) Scoping Report Staff Workshop"

To Whom It May Concern:

The Energy Commission is soliciting public input during all phases of AB 758 program development, and will periodically update the program and adopt revisions that in its judgment will improve or refine the program.

Sunrun appreciates the opportunity to comment on market necessities described within the Comprehensive Energy Efficiency Program for Existing Buildings Scoping Report (August 2012, The Scoping Report). Specifically we describe how the strategic inclusion of a transparent California Solar Statistics<sup>1</sup> data program (Data Set) into the development, budget and multiyear implementation of the landmark California Solar Initiative (CSI) has advanced the accomplishment of the program's goals and benefited stakeholders. For the betterment of California's conservation, energy efficiency and generation goals, this strategy should be replicated in the development of an energy efficiency program for existing residential and nonresidential buildings as prescribed by AB 758 (2009 Skinner).<sup>2</sup>

Sunrun provides solar power as a service to over 13,000 homeowners in California. Founded in 2007 and based in San Francisco, Sunrun has 200 direct employees while supporting a partner network of over 2,000 installation workers in California alone. SunRun's growth and solar leasing business model is allowing more homeowners in California to upgrade their homes to solar energy without the high upfront costs.

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<sup>1</sup> California Solar Statistics is the official public reporting site of the California Solar Initiative (CSI), presented jointly by the CSI Program Administrators and the California Public Utilities Commission. This site presents actual program data, exported from the CSI online application tool each Wednesday. <http://www.californiasolarstatistics.ca.gov/>

<sup>2</sup> AB 758 requires the Energy Commission to develop a comprehensive energy efficiency program for existing residential and nonresidential buildings. The program, which will be established through the regulatory process, is required to improve the energy efficiency of existing residential and nonresidential structures which fall significantly below the efficiency required by the current Standards. AB 758 directs the Energy Commission to consider effective ways to report building energy assessment results to building owners, prioritize annual energy saving opportunities, and estimate customer utility bill savings that could result from the improvements. The comprehensive AB 758 program is expected to evolve and transform the market, and deliver substantial energy savings and greenhouse gas emissions reductions inherent in the state's existing residential and nonresidential buildings.

From the start Sunrun and other like-minded companies have utilized the CSI's Data Set to increase the competitiveness of market offerings and decrease project costs to the point that the residential sector of the CSI is years ahead of schedule in two out of three IOU service territories.<sup>3</sup> The Data Set, which is easily uploaded into an excel spreadsheet from the California Solar Statistics website includes essential information covering over 128 thousand CSI rooftop solar energy projects. The categories of data cover project timeline milestones, geographic location of each installation, equipment specifications, energy capacity ratings, project size, pricing, and other useful details that are constantly analyzed, dissected and relied upon by numerous stakeholders.

The process of making such key program data public benefits various actors of the clean technology industry in addition to policy makers and researchers worldwide. However, the ultimate beneficiary of such policy foresight has been the California solar consumer in the form of lower costs and higher quality systems and installations. Therefore, we reiterate the Scoping Report's case that all energy reduction efforts will better succeed when relevant information is broadly available and easily acted upon. Data collection, organization, analysis and delivery are actions needed to remove the market barriers to the adoption of energy efficiency in buildings. California's consumers, building owners, and many existing building professionals all need information on the energy savings expected from efficiency upgrades, and on the relative performance of existing residential and commercial building properties.

Financial institutions considering energy efficiency investments need to assess investment risks, which are best supported by measured performance data incorporated into probability distributions of cost savings from existing building efficiency improvements. The development and maturation of the 3<sup>rd</sup> party solar leasing model allows for a larger demographic of potential solar customers by including those who could not or chose not to pay the high up-front costs.<sup>4</sup> Undoubtedly the Data Set provides essential market transparency to the investor community's assessment of rooftop solar's potential, a clear example of a public program unlocking additional private investment. From this perspective the Data Set provides valuable insight into installation costs and trends, the "bankability" of certain types of equipment (providing market share data and trends for panel and inverter vendors), system sizes, project timelines, and performance based calculations and projections, geographic trends by zip code, and competitive landscape research. Such insight also enables sales, marketing, and business development teams to better ascertain specific community solar adoption rates and verify which installation companies are successfully building their businesses across the state. Smarter allocation of marketing efforts drive down customer acquisition costs and ultimately disseminate into lower costs per kilowatt hour for the end consumer, who can now gain insight beyond word of mouth, multiple quotes, and cursory research.

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<sup>3</sup> <http://www.csi-trigger.com/>

<sup>4</sup> For example PV Solar Report released a 2011 study California's Top Solar Cities which concluded solar adoption to be greater in median income zip codes.  
[http://www.pvsolarbuzz.com/images/stories/PDFs/topsolarcitiesexecbrief\\_9\\_28\\_11.pdf](http://www.pvsolarbuzz.com/images/stories/PDFs/topsolarcitiesexecbrief_9_28_11.pdf)

The Scoping Report correctly points out that useful information to stakeholders, including individual energy efficiency project data does not need to include the confidential descriptors that identify specific property addresses or personal data on the project participants. The CSI Data Set provides a demonstrative benefit to all stakeholders without divulging any individual addresses within the zip code and geographic details provided. To best achieve California's energy efficiency, energy reduction and climate goals a publically available Data Set, akin to the one established for the CSI program should be implemented as part of AB 758's development of a comprehensive energy efficiency program for existing buildings.

Thank you for the opportunity to comment. Please don't hesitate to contact me at 415 580 6980 if you have any questions or concerns.

A handwritten signature in black ink, appearing to read "Walker Wright", with a stylized flourish at the end.

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