



LOS ANGELES AREA
CHAMBER OF COMMERCE
125th anniversary

July 12, 2013

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 12-EBP-1
1516 Ninth Street
Sacramento, CA 95814-5512

California Energy Commission

DOCKETED

12-EBP-1

TN 71578

JUL 12 2013

Re: Comments on the Comprehensive Energy Efficiency Program for Existing Buildings Draft Action Plan (Docket No. 12-EBP-1)

Dear California Energy Commission:

The Los Angeles Area Chamber of Commerce (“Chamber”) would like to submit the following comments regarding the California Energy Commission’s (“CEC”) *Comprehensive Energy Efficiency Program for Existing Buildings Draft Action Plan* (“Draft Plan”). The Chamber is the largest business advocacy organization in the L.A. region and represents more than 1,600 member organizations that collectively employ 750, 000 people.

The Chamber generally supports efforts to improve energy efficiency in buildings. In fact, the Chamber is a founding partner of the L.A. Better Buildings Challenge (“Challenge”)—a regional chapter of the U.S. Department of Energy’s national leadership initiative to reduce energy consumption in a region’s building portfolio 20% by 2020. To date, the Chamber and its partner organizations have successfully enrolled 12.4 million square feet of existing L.A. building space in the Challenge. This voluntary program has proven to be successful in demonstrating to building owners and managers of existing buildings in L.A. that energy efficiency upgrades can be economically beneficial for both owners and tenants.

The Chamber encourages the CEC to build on the successes of the Challenge, which focuses on consolidating and improving access to information, incentives, financing and technical assistance. We believe many of the “No Regrets Strategies” and “Voluntary Pathways” proposed in the Draft Plan build on those prudent and cost-effective strategies. However, we believe the “Mandatory Approaches” outlined in the Draft Plan, in particular those that would mandate building upgrades and the disclosure of energy use, would send the wrong message to the business community in LA, discourage buy-in of existing energy efficiency programs and investments, and could be too costly and burdensome for small business owners and managers to comply with. If anything, such mandatory approaches should be reserved as a last resort in the event that No Regrets Strategies and Voluntary Pathways do not produce the outcomes required by Assembly Bill (“AB”) 758 (Skinner).

In sum, we believe efforts aimed at improving energy efficiency in existing buildings should remain voluntary at this time and focused on consolidating and improving access to information and resources, especially for small business owners. We also recommend that staff better engage business owners and managers in their outreach efforts and decision-making processes. Almost

all of our members that we reached out to regarding the Draft Plan were not aware of it or AB 758 even though they would be directly impacted by its implementation. Therefore, we encourage the CEC to work in partnership with chambers of commerce throughout the State and industry organizations like the Building Owners and Managers Association (BOMA) to raise awareness of and solicit additional feedback on this Plan, both in its development and implementation. Doing so will ensure that the strategies included in the final plan are technologically feasible, cost-effective, and easy to comply with.

If you have any questions, please feel free to contact Frank Lopez at (213) 580-7573 or flopez@lachamber.com. Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink that reads "Gary Toebben". The signature is written in a cursive, flowing style.

Gary Toebben
President & CEO

BOLD IN **BUSINESS**