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EnergySavvy Comments on Draft AB 758 Action Plan
Docket 12-EBP-1

The AB 758 workshops and stakeholder comments have well articulated the current challenges impeding the 1) scaling of retrofits in California and 2) delivering accurate predicted savings to consumers. These comments focus on a way forward propelled by increased data transparency for all stakeholders into what is being achieved through energy efficiency programs. To be most valuable for driving good policy and business decisions, that data transparency should happen as near to real-time as possible.

Innovation in software and access to data via standards like Green Button and HPXML create an opportunity to deliver expediential improvements relative to the status quo. Additionally, today's innovations would serve as the foundation for future market innovations in technology and business models. This would allow the energy efficiency industry to scale in a similar way that distributed solar generation has.

An example of such innovation is providing near real-time feedback to stakeholders on the savings energy efficiency projects - and portfolios of projects - are achieving. Providing M&V style analysis more timely and at lower cost than the current M&V process would play a foundational role in achieving California's energy efficiency goals by:

- Giving utilities and implementers insight into how their portfolio of energy efficiency projects are performing relative to expectations. This would allow for adjustment before the M&V cycle at the end of program implementation identifies issues, which is often too late to drive improvements.
- Allowing policy makers and regulators to more accurately and frequently demonstrate the impact their energy efficiency initiatives are having relative to their objectives. Further, such data transparency would inform future policy decisions.
- Giving contractors the ability to more accurately forecast energy savings and adjust their future forecasting tools based on comparison to actual usage data on a frequent basis.
- Encouraging consumers and financiers to invest in energy efficiency projects by having higher confidence in the savings associated with those projects, because there will be transparency and accountable into project performance.

While this software-driven functionality is significantly different than the status quo, it is quite plausible. Indeed, leading energy efficiency programs in other states such as New York, Arizona, and Virginia are adopting similar initiatives. Those initiatives have encouraged many software companies focused on energy efficiency to invest time and money to serve those markets, because they see the potential for applying technology to

scale the industry in those states. That same investment can be leveraged to scale retrofits in California if policy and regulation enables it.

Here is a replicable roadmap for this initiative that other states are currently pursuing:

1. Collect project-level data accurately and at low marginal cost by using a data platform that integrates with various facility-auditing tools and IT systems. For example, allowing contractors to choose their own auditing tools and have data integration happen through standards like HPXML and Green Button.
2. Glean insights from the data by performing frequent and low marginal cost analysis enabled by having the data in a central place and automated analytics vs. manual calculations. For example, are the predicated savings for projects accurate relative to actual savings and what adjustments in assumptions or modeling tools need to be made? Note that "data in one place" could be either at the utility level or aggregated across the state, depending on the desired application and future data access decisions.
3. Provide raw data transparency or aggregated insights based on analysis to industry stakeholders to inform their decision-making via permissions-based access to data. For example, what programs, measures, or customer segments would benefit from more or less focus in a given geography?

Respectfully submitted,

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