LARC
Los Angeles Regional Collaborative
for Climate Action and Sustainability

Los Angeles Regional Collaborative
for Climate Action and Sustainability
c/o UCLA Institute of the Environment and Sustainability
La Kretz Hall, Suite 300
Los Angeles, CA 90095-1496

August 17, 2012

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 12-EPIC-01
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Docket No. 12-EPIC-01

To Whom It May Concern:

On behalf of the Los Angeles Regional Collaborative for Climate Action and Sustainability (LARC), I would like to thank the Energy Commission for this opportunity to comment on the development of the research and development investment plan for the Electric Program Investment Charge (EPIC). The investment in scientific research that has occurred under the CEC's PIER program has been an invaluable contribution to California. LARC is encouraged by the development of the EPIC program as a means to continue funding critical energy research in California.

As the investment plan for EPIC is developed, LARC believes it is imperative to incorporate the following points:

- Research into climate change adaptation should continue. The impacts of climate change on energy generation, transmission, distribution, and consumption is a clear and critical nexus with ratepayer benefits. Research that continues to support the understanding of climate change on California communities will ensure better resources for investing in demand management, renewable energy (wind and solar) installations, and the impacts of extreme events on energy infrastructure and communities (e.g. heat waves).

- Ratepayer benefits should be clearly defined to recognize that non-monetary benefits are critical. This means that considerations of ratepayer benefits must include public health, environmental impact (particularly greenhouse gas emissions), job creation, and community benefits.

- In order to meet ratepayer benefits, R&D investment decisions must be influenced by diverse stakeholders that include local governments, community organizations, businesses, and academic experts. R&D decision-making to ensure ratepayer benefits must not be defined solely by investor owned utility (IOU) priorities.

- Energy research must recognize the diverse energy situations in communities spread throughout the state. Research should be conducted not with a one-size-fits-all approach to energy solutions in California, but should provide community-appropriate solutions that recognize differences in economies, demographics,

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climate, capacity, and urban form. Distribution of funds should reflect the need to create appropriate solutions (and ratepayer benefits) for different parts of the state.

- Efforts should be made to ensure that EPIC funding is both equitably and meritoriously distributed throughout the state.

- Regional collaboratives should be utilized for informing investment decisions. These collaboratives can represent local interests and provide critical regional input from stakeholders that are better able to address diverse ratepayer concerns.

- Innovation hubs distributed around the state should be supported. By leveraging existing and new hubs that bring together universities, businesses, and local governments, these hubs can directly apply R&D projects to economic development and energy-saving technology implementation. Supporting such collaborations and innovation centers will ensure further leveraging and impact on ratepayers distributed throughout the state.

- Permanent centers for energy research should be supported. Research centers provide a critical mechanism for long-term research that achieve efficiencies of scale by: (1) leveraging funds from state, federal, and private sources; (2) offering unparalleled opportunities for education and training that add to the capacity of the state's energy professionals; (3) ensuring continuity through a cohesive and comprehensive research plan that builds on past research, ensuring that research dollars are truly investments and that results are not lost; (4) capitalizing on expertise that is serves as a resource to local, regional and state decision-makers seeking to reduce energy use across California; (5) capitalizing on relationships to universities, local governments, private companies, and other organizations that can continue to rely on an expanding network for identifying and conducting energy research with a clear ratepayer benefit.

- Local governments, including cities and agencies, should be eligible to participate in EPIC research. Many local governments—including through municipally-owned utilities, sanitation districts, and water providers—maintain active research and development programs. These would benefit from access to the R&D programs and experts supported by EPIC. It is also possible to meet this suggestion through partnerships with private and academic organizations that receive EPIC funding.

- Research into energy should recognize the integrated nature of energy systems. It should thus include research into embedded energy (e.g. in water, materials, and resources), the socio-economic and policy characteristics that govern energy systems, and the local/regional features that influence reductions in total energy use or the impacts of energy on the economy and environment.

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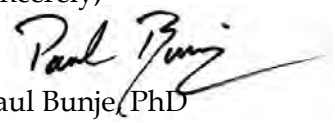
Thank you again for the opportunity to comment on the development of the EPIC investment plan. Please do not hesitate to call on LARC for further clarification, suggestion, or comment. We are built to help serve the climate action and sustainability needs of Greater Los Angeles and look forward to a continued partnership that results in benefits through research to all Californians.

Sincerely,



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