

October 2, 2012

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



**Subject: Docket No. 12-EPIC-01**

The National Asian American Coalition (“NAAC”) appreciates the opportunity to file these written comments with the California Energy Commission (“CEC” or “Commission”), and is grateful for the chance our organization had to offer oral comments at the September 27th, 2012, Electric Program Investment Charge (“EPIC”) workshop.

The NAAC wishes to commend the CEC commissioners for their involvement and leadership, as well as commission staff for their preliminary investment plan. The plan is a very positive step towards an inclusive and fair energy future for California.

To this end, we offer the following comments:

*a. Objective S 1.2 – Next Generation Lighting Systems*

As we mentioned during public comment, the NAAC believes that reducing the cost of LED lighting can provide a direct benefit to ratepayers, particularly low-income ratepayers. The key to reducing the cost of LED lighting involves a reduction in manufacturing costs as well as increasing their efficiency (measured in lumen per watt).

To this end, we strongly support EPIC investment in projects which will achieve these goals for LED lighting.

We also agree with the comments made by Staff during the workshop with regard to a flexible definition of “pre-commercial.” While it is true that LEDs are available commercially, their price is significantly higher than compact fluorescent bulbs or incandescent bulbs. This initial cost is a barrier to adoption, and further investment in the manufacturing processes and materials will make these energy efficient technologies more available to a larger number of Californians, serving to dramatically reduce utility bills for those who are forced to devote a high proportion of their monthly budgets toward electricity.

*b. Objective S 1.6 – Multifamily Dwellings*

The NAAC strongly supports the awareness the proposed plan displays with regard to incentivizing the refit of multifamily dwellings to make them more energy efficient. Building owners who do not pay electricity bills have less desire to spend money to refit their units. As low income families are more likely to rent, and so any refits can greatly affect their budget.

The inclusion of this objective will greatly increase the return to ratepayers. According to the U.S. Census Bureau’s American Community Survey, over 30% of California’s housing is multi-unit. In

major metropolitan areas such as San Francisco and Los Angeles, close to 40% of households reside in multi-unit structures.

*c. Objective S 15.1 and 15.2 – Workforce Development*

The NAAC strongly agrees with many of the conclusions within the *California Workforce Education & Training Needs Assessment*, which are relied on within the Proposed Investment Plan authored by CEC Staff, and by the NAAC during the original California Public Utilities Commission (“CPUC”) rulemaking (R. 11-10-003). We believe that investment in and coordination with California’s 112 community colleges for *long-term* job training in energy efficient related areas. Community colleges have a high degree of penetration statewide, and already serve as a locus for vocational training. This will serve to provide more than low-pay jobs, and will provide the foundation for career building opportunities.

*d. Advisory Board*

The NAAC further believes that a formal advisory structure that offers a voice to underserved communities is essential. While it would be impractical to have a broad array of voices represented, there should be some effort to ensure that diversity of perspective exists among community based organization stakeholders. The NAAC recommends that no less than three community based organizations be members of the advisory board. These groups should be located in California and provide direct services to communities in California. Each organization should be tax-exempt, as described in Section 501(c)(3) or 501(d) of the Internal Revenue Code. Each group’s total revenue (as reported on a Form 990) should not exceed \$35 million. These groups should be rotated following each investment cycle.

The advisory board mission and duties should be explicitly for information and consultation only. No delegation of decision making power should be made to the advisory board.

In conclusion, the NAAC appreciates the opportunity to comment on the triennial investment plan for the new Electric Program Investment Charge Program and looks forward to continued engagement with the CEC, the CPUC and stakeholders.

Sincerely,



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