



February 13, 2014

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814



Comments of the San Francisco Bay Area Regional Energy Network (BayREN) and Southern California Regional Energy Network (The Energy Network) on EPIC Second Investment Plan, Docket 12-EPIC-01 - Docket No. 12-EPIC-01

Honorable Commissioners and Staff:

On behalf of the San Francisco Bay Area Regional Energy Network (BayREN) and Southern California Regional Energy Network (The Energy Network or SoCalREN), we would like to thank you for the opportunity to comment on the Electric Program Investment Charge (EPIC) Second Triennial Investment Plan. Together our organizations represent the majority of municipal governments and total population in California. As providers of a wide range of energy efficiency programs at the local government level, our focus remains on facilitating the market penetration of energy efficiency and renewable energy technologies into California buildings.

We offer the following comments specifically in regards to Local Regulatory and Permitting Challenges. A variety of initiatives were prioritized and funded in the First EPIC Investment Plan, including clean energy technology planning and permitting processes, model ordinances for clean energy, and local government needs assessments. While these focus areas are an important first step, there remain a significant number of challenges to the widespread adoption of clean energy and high efficiency measures at the local government level. Regional Energy Networks were created to address several such challenges, including achieving economies of scale and information/resource sharing to benefit cities and counties across a wide geographic area. Focusing the funding development and expansion of resources at the regional level ensures that the benefits extend to a wider variety of local governments, including small cities and counties which lack dedicated staff to pursue clean energy projects. Additional benefits include leveraging the resources already in place among regional networks, building capacity around energy efficiency and clean energy technologies, and targeting State priority areas such as disadvantaged communities (AB 340), existing buildings (AB 1103, AB 758), and improvements to reduce GHG emissions (AB 32).

We believe there is significant potential for increased penetration of advanced technologies through the improvement of processes at the local government level. Some of these areas include:

- Integration of Energy Programs with Local Processes – Exploring methods and techniques for coordinating the local government review and inspection of projects receiving incentives from energy efficiency and renewable energy programs.
- Local government participation and involvement in energy technology program design and implementation. Leveraged by regional programs, this effort could provide the vehicle for local governments to develop processes and expertise to better review and permit such projects.
- Government Building Demonstration Projects – Utilize the array of local government buildings to demonstrate and evaluate technologies.

- Energy Code Compliance Enhancement – Evaluating and improving the rate of compliance with Energy Code standards through education, regional coordination, and capacity building.
- Coordination Tools for Local Government Planning Processes – Develop tools and resources to integrate the various planning documents local governments use to consider energy projects, including General and Specific Plans, Climate Action Plans, Water Management Plans, Zoning Ordinances, energy-specific ordinances, and Municipal Service Reviews/Spheres of Influence.

This EPIC Investment Plan has the potential to facilitate tremendous improvements in efficiency and coordination at the local government level, creating more streamlined processes, improved understanding and implementation of technologies, and penetration into the markets of greatest need. By focusing resources on local governments, EPIC funds can be the critical tool needed to bring these agencies into a leadership role in the widespread adoption and integration of the most promising technologies.

Local governments are in a unique position to provide measurable gains in local regulatory and permitting efficiency. They can address priority areas of energy policy and program direction from the California Energy Commission, California Public Utilities Commission, and the California Legislature, all while improving the quality of services provided to all Californians. We urge the Commission to include this as a high priority area in both Technology Demonstration and Deployment (TD&D) and Market Facilitation components of the EPIC Investment Plan, with funding levels commensurate to its importance.

We appreciate the opportunity to comment, and the Energy Commission’s efforts to lead in the development and deployment of efficiency and clean energy technologies in California.

Sincerely,

County of Los Angeles



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