

Docket Optical System - Input and Questions on SEP Preliminary Guidelines

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To: <sep@energy.state.ca.us>
Date: 8/5/2009 8:46 PM
Subject: Input and Questions on SEP Preliminary Guidelines
CC: Peter Waring <pwaring@comcast.net>

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Dear Sirs: please allow us to contribute some input and ask some questions regarding the SEP Preliminary Guidelines, as released in the Seminars on July 28, 29 and 31. My partner, Peter Waring, and I manage a non-profit energy efficiency training and development entity offering our services in the California marketplace. Our questions and comments would include:

1. To fulfill the green jobs training agendas that will meet the SEP criteria - Energy-Able will need to purchase some number of sets of energy auditing equipment, which will cost approximately \$15k per set. May we inquire if the required purchase of these essential training tools and technology would be equally considered and supported by the SEP program, in addition to other more traditional training costs such as staff salaries, administrative costs, marketing outreach, etc.?
2. Energy-Able is structured as a non-profit entity dedicated to training and education. In that regard, our focus is not upon making profits which can then be re-invested in the business or attract private investors. As a key component of the SEP program purpose is cited as "sustainable" - our question is if this criteria is assessed only in a financial basis? We have determined that the first essential step required for advancing energy efficiency is training and education both of the technical providers of this service as well as the consumers who will invest in the energy retrofit renovations. Our non-profit role in taking this first step on behalf of the EE industry and its consumers may require deficit financing of continuing grants from government, foundations or private industry. We believe that such a model can be sustainable in that it can continue on as an integral part of the California energy program, but not be directly self-funding. Will this proposed model qualify as "sustainable" in your view?
3. Our business plan entails a very important component of consumer research, customer analysis, on-going tracking and monitoring of continuing energy consumption post-retrofit and renewable installation. Our assessment is that the "missing link" of the right motivation and messaging to guide consumers to make the necessary and on-going commitment and investment in energy efficiency is the first priority to be addressed. This proposed developmental research and marketing program will lay the groundwork for future continuing EE programs. In that regard - it should be considered as an "upfront investment" which will provide returns for years into the future. Will such an "upfront cost" be considered as an appropriate and necessary one-time-only investment, worthy of SEP funding?
4. The "Three-Tiered Approach" presented in the Residential Building Retrofit Program presents an appropriate step-wise progression of outreaching to building owners re: energy efficiency. However we are very focused upon guiding consumers through the continuum and achieving the 3rd Tier of Whole-House Retrofits. We would like some clarification that this "deep energy retrofit" is an acceptable goal for all consumer participants. If they only make it to the 1st or 2nd Tier of lesser criteria - that is understandable and acceptable. But we recommend that the initial goal must be 3rd Tier for all participants. Does the CEC concur that the initial and continuing goal is 3rd Tier - or will 1st or 2nd Tier alone be the goal for some program participants?
5. The work that Energy-Able is doing in Sonoma County with training of auditors and contractors under the California Building Performance Contractor's Association (cbpca) is around the holistic building assessment discipline of "Building Performance Institute" (BPI). This is a much more intensive, overall, building integrated and scientific measurement process than what HERS has encompassed in the past. In that regard - can BPI stand as an acceptable (higher) level of building performance, in place of HERS (II) for SEP funded programs?
6. Energy-Able is very excited about the opportunity to partner on a regional basis with other entities in fulfillment of the CEC SEP program funding. Our question is: how might we most efficiently define who else in our regional area is interested in partnering, such that we can work together in our SEP proposal?

Does the CEC have any plans for coordination and communication between interested regional parties that we will be able to take advantage of?

7. One comment that we would like to offer is the powerful new financial enablement program of AB811 for energy efficiency and renewable energy. We would suggest that this consumer loan program could be a very effective sustainable financing (revolving loan) program that could drive energy efficiency and renewable programs. Is there some way that the CEC would be willing to commit its SEP funding to help AB811 programs get up and running? Once those are in place, they can drive energy transformation deep into the building stock and for long into the future.

Thank you very much for allowing us to pose these questions, request these clarifications, and offer these comments re: the SEP Preliminary Guidelines.

Sincerely, Andy F

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