

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Southern California Edison Company (U338E) for Approval of Energy Efficiency Rolling Portfolio Business Plan.

And Related Matters.

Application 17-01-013
(Filed January 17, 2017)

Application 17-01-014
Application 17-01-015
Application 17-01-016
Application 17-01-017

COMMENT ON BUSINESS PLAN ENERGY EFFICIENCY METRICS BY COUNTY OF VENTURA ON BEHALF OF THE 3C-REN, TRI-COUNTY REGIONAL ENERGY NETWORK

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For the 3C-REN, Tri-County Regional Energy Network
San Luis Obispo County, Santa Barbara County and Ventura County

Dated: May 22, 2017 in Ventura, California

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The County of Ventura on behalf of the Tri-County Regional Energy Network (3C-REN), which includes the Counties of Ventura, San Luis Obispo and Santa Barbara, respectfully submits this comment document in response to requests in **“ADMINISTRATIVE LAW JUDGE’S RULING SEEKING COMMENT ON ENERGY EFFICEINCY BUSINESS PLAN METRICS”** (ALJ RULING EE BP METRICS) filed May 10, 2017 to this proceeding for Applications A17-01-013, A17-01-014, A17-01-015, A17-01-016 and A17-01-017. This response is intended to provide clarification on residential sector-level and program-level metrics for the purpose of evaluating the reasonableness of the 3C-REN Energy Efficiency Business Plan (3C-REN BP).

II. Scoping Memo, Appendix B: Questions applicable to all prospective Program Administrators (PAs)

- 1. Demonstrate in a quantitative way, via table or graphic, how the proposed metrics cumulatively are useful and effective indicators of each PA’s likely**

achievement of targeted energy efficiency program uptake and overall savings goals.

The attached 3C-REN Solutions Flow Chart (Attachment A) with problem statement and results correlated with each strategy, the 3C-REN Strategy Table (Attachment B) defining the strategies outcomes, and the 3C-REN Metrics by Phase Table (Attachment C) show how the 3C-REN BP strategies overcome the barriers for program uptake across the customer journey, the success metrics associated with them, and the overall savings of the program. While this information reflects the cumulative energy efficiency (EE) savings, it also reflects the holistic approach of the 3C-REN BP. Not only will the plan measure number of participating households and EE savings that will increase through 2025, the 3C-REN BP also intends to achieve other non-energy efficiency benefits including workforce education and training, codes compliance, and filling service gaps to hard-to-reach and underserved communities achieved through the customer journey suite of services.

2. Provide the number of multi-family units and multi-family properties in your respective geographic areas.

The 3C-REN BP outlines the household characteristics for the Tri-County Region¹ showing each County's estimated housing occupancy, owner/renter counts, and housing per unit counts. Department of Finance report analysis showed total occupied housing units² for the Tri-County Region estimated at 512, 000, and about 37% of those homes are rental units. The analysis further showed a total Multifamily (2

¹ 3C-REN BP, Table 9. 3C-REN Owner and Renters, Units Per Household, p. 33

² California Department of Finance. 2016. "Report E5 - Population and Housing Estimates for Cities, Counties, and the State, January 1, 2011-2016, with 2010 Benchmark"

or more attached units) count of 128, 205 units, or approximately one-quarter of the Tri-County Region occupied households.

III. Service

In alignment with requirements by the Public Utilities Code and the Commission's Rules of Practice and Procedure, this supporting document will be served to all parties on the official CPUC service list for the application proceedings A.17-01-013, A17-01-014, A.17-01-015, A.17-01-016 and A.17-01-017, and a copy of this and other documents relating to the 3C-REN BP are publicly available online at: <http://www.ventura.org/environment/energy-efficiency>.

Respectfully submitted,

/s/ Alejandra Tellez

By: ALEJANDRA TELLEZ

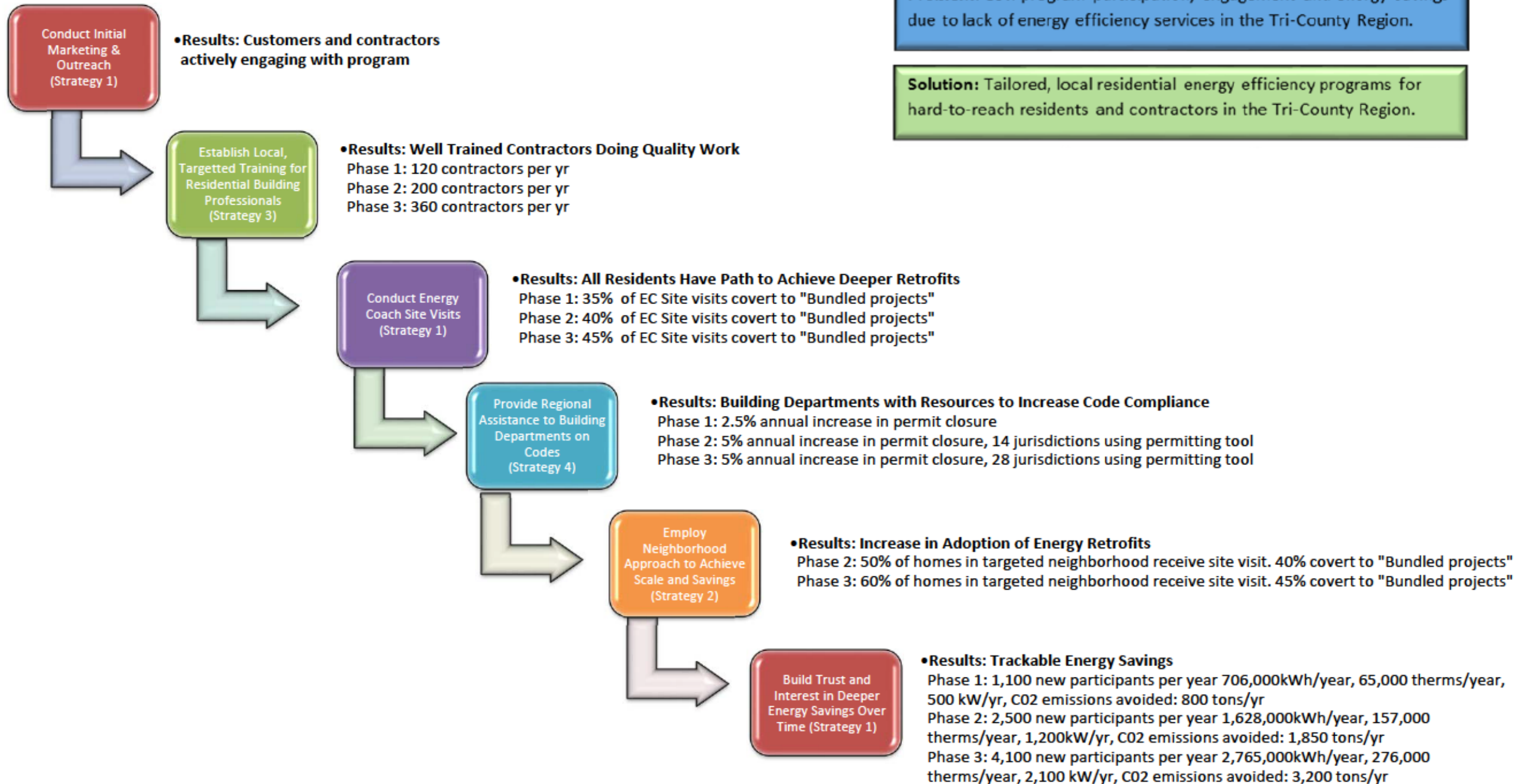
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**ATTACHMENT A:
3C-REN SOLUTIONS FLOW CHART**

Attachment A: 3C-REN Solutions Flow Chart



**ATTACHMENT B:
3C-REN STRATEGY TABLE**

Attachment B: 3C-REN Strategy Table

| Strategy | S1: Strategy 1 Build trust and interest in deeper energy savings over time. | S2: Strategy 2 Employ neighborhood approaches to achieve scale in reach and savings. | S3: Strategy 3 Establish Local, Targeted Training for Residential Building Professionals. | S4: Strategy 4 Provide Regional assistance to Building Department and Jurisdictions to help comply and adjust to Codes and future updates. |
|-----------------|---|--|---|---|
| Barriers | <ul style="list-style-type: none"> Confusion and lack of engagement due to silos, fragmented program delivery and multiple messages, in large part due to multiple IOUs. Lack of understanding and value of energy efficiency and non-energy benefits Dispersed population over wide geographic area. Split Incentives for rental properties make it difficult to achieve deep retrofits. | <ul style="list-style-type: none"> Confusion and lack of engagement due to silos, fragmented program delivery and multiple messages, in large part due to multiple IOUs. Split Incentives for rental properties make it difficult to achieve deep retrofits. | <ul style="list-style-type: none"> Contractors do not appreciate the value of energy efficiency and how it can be incorporated into their work. Inadequately trained and engaged workforce. | <ul style="list-style-type: none"> Difficult to engage and achieve energy savings with renters and landlords (split incentives). Building Departments lack the capacity and resources to effectively enforce codes. |
| Metrics | <ul style="list-style-type: none"> Energy Savings; Number of Participants; Project Conversions from Energy Coach; GHG avoided Percent of homes treated in a neighborhood; Percent of Project Conversions to “Bundled” projects | <ul style="list-style-type: none"> Energy Savings; Number of Participants; Project Conversions from Energy Coach Percent of homes treated in a neighborhood; Percent of Project Conversions to “Bundled” projects | <ul style="list-style-type: none"> Number of Contractors Trained; Increase in permit closures; Energy Savings | <ul style="list-style-type: none"> Number of New Jurisdictions using the Permitting Tool |
| Insights | <ul style="list-style-type: none"> Increase in participation and ability to achieve energy savings indicate barriers are being addressed. Cumulatively these equate to the metrics above. Location and types of projects/participation can be used to analyze geographic gaps, opportunities and help to refine programs if expected results are not achieved. | <ul style="list-style-type: none"> Level of penetration into a neighborhood indicates that the approach to address EE at scale is effective. If penetration is low, it will indicate that the approach is not working. | <ul style="list-style-type: none"> Number of contractors trained will be a useful measure to estimate levels of engagement; increases in permit closures will provide indication that training is effective in reaching higher quality projects. | <ul style="list-style-type: none"> Active use of the permitting tool will provide real time analysis of engagement by building departments; it will allow team to target those who are not participating and to know that those who use it are providing higher levels of service. |

**ATTACHMENT C:
3C-REN METRICS BY PHASE**

Attachment C: 3C-REN Metrics by Phase

| Metrics | Phase 1 Short Term | | Phase 2 Mid Term | | | Phase 3 Long Term | | |
|---|-----------------------|------------------|---------------------|------------------|-------------------|----------------------|-------------------|-------------------|
| | 2018 | 2019 | 2020 | 2021 | 2022 | 2023 | 2024 | 2025 |
| New Participants per Year Avg | 860 | 1340 | 1655 | 2480 | 3365 | 3724 | 4060 | 4516 |
| Energy Coach Site Visits Converted to "Bundled" Projects | 35% or 301 | 35% or 469 | 40% or 662 | 40% or 992 | 40% or 1346 | 45% or 1676 | 45% or 1827 | 45% or 2032 |
| Avg Total Energy Savings in kW | 415 | 585 | 800 | 1,200 | 1,600 | 1,920 | 2,110 | 2,270 |
| Avg Total Energy Savings in kWh | 580,500 | 831,500 | 1,085,500 | 1,606,500 | 2,192,000 | 2,511,000 | 2,738,000 | 3,046,000 |
| Avg Total Energy Savings in Therms | 53,000 | 77,000 | 104,700 | 154,850 | 211,450 | 251,000 | 273,000 | 304,000 |
| Avg Avoided CO2 in tons | 658 | 941 | 1,200 | 1,850 | 2,500 | 2,900 | 3,200 | 3,500 |
| Avg of New Contactors Trained | 120 | 120 | 160 | 200 | 240 | 290 | 370 | 420 |
| Number of Jurisdictions Using Permitting Tool | Ramp Up | Ramp Up | 4 | 9 | 14 | 18 | 23 | 28 |
| Increase in Quality Control/Permit Close Out (avg annual increase in permits triggering Title 24 Part 6) | 2.5% | 2.5% | 5% | 5% | 5% | 5% | 5% | 5% |