

General – LGP Public- and Commercial-Sector Business Plan Feedback  
 City and County Association of Governments of San Mateo County (C/CAG)  
 November 21, 2016

C/CAG works on issues that affect the quality of life in general in San Mateo County, including: transportation, housing and air quality, energy efficiency and water conservation, the interaction of sea level rise and stormwater runoff and flooding, and airport/land use compatibility planning. C/CAG operates as a Joint Powers Authority and has membership that includes each of the 20 cities and the County in San Mateo County and partners with these and other agencies to find unique and innovative solutions to address these interconnected issues. In 2009, C/CAG formed its local government partnership with PG&E and has been administering the LGP program successfully, with staff support from the County of San Mateo ever since.

Based on our experience over the past eight years, the following are general, non-specific comments on the Public/Commercial chapters of Program Administrator (PA) business plans. C/CAG does not identify specific PA’s plans in these comments.

<i>General Input</i>			
Comment #	PA(s)	Sector	Comment
<i>CCAG-1</i>	<i>General</i>	<i>Public/Commercial</i>	<p><b>Observations</b>  <i>Challenges/Areas of Improvement:</i> Some of the issues cited by PAs as current issues under existing program administration may be traceable back to requirements by the CPUC and challenging to the work of LGP’s, and not necessarily the result of current PA practices.</p> <p><b>Recommended Action</b>                      PAs should work closely with stakeholders and the CPUC to identify and resolve any barriers to successful outcomes.</p>

CCAG-2	General	Public/Commercial	<p><b>Observations</b></p> <p><b>Experience and Technical Knowledge:</b> Significant experience, energy technical expertise, administration, coordination, contracting, and budgeting expertise is required to continue or assume the role as PA for the Public/Commercial sectors and to lead LGPs.</p> <p><b>Recommended Action</b></p> <p>Any business plan proposer whose plan does indicate this depth of experience should receive additional scrutiny.</p>
CCAG-3	General	Public/Commercial	<p><b>Observations</b></p> <p><b>Launch Time for New Approaches:</b> Any significant changes in how LGPs are administered may require significant ramp up time, which could delay existing work as we try to reach the State goals of reducing greenhouse gas emissions and transition of existing building stock for 2030 and beyond.</p> <p><b>Recommended Action</b></p> <p>Any changes in administration of LGPs should be phased in over multiple years, to avoid the start and stop issues for which this business plan process was intended and designed to alleviate.</p>
CCAG-4	General	Public/Commercial	<p><b>Observations</b></p> <p><b>Statewide Consistency:</b> Consistency across the State for LGPs should allow for flexibility in implementation based on local needs, that partnerships may perform best when there is freedom in diversity of approach, yet savings delivery should be required, from almost day one.</p> <p><b>Recommended Action</b></p> <p>All business plans that strive for statewide consistency should also build in flexibilities to allow local implementation based on unique local characteristics. Additionally, include efforts to cross-pollinate approaches to program delivery and allow for diversity to fit local needs. Only in cases where effort is not being made to accomplish goals should there be consideration to design the program for the specific LGP. In addition, a forum (which could be the SEEC forum) should be provided by the State to share diverse approaches to program delivery, which come from LGPs sharing their story of how and why their program is implemented.</p>

CCAG-5	General	Public/Commercial	<p><b>Observations</b></p> <p><b>Market Transformation:</b> Market transformation is key to the success of meeting state goals for energy efficiency of existing buildings. All programs combined are unlikely to serve every energy efficiency opportunity site in the State.</p> <p><b>Recommended Action</b></p> <p>All business plans should include a specific section that addresses an approach for connecting building owners to contractors with less or no intervention from State programs. Program implementers should be working on systems that provide incentive education and implementation justification, even before a site is identified by an administrated program in order to drive the market.</p>