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To: "facilitator caeccc.org" <facilitator@caeccc.org>

Date: October 26, 2016 at 10:51 PM

Subject: Comments by Silent Running on Proposed Statewide Downstream Programs

Thank you for the opportunity to provide comments on the Proposed Statewide Downstream Programs, as set forth in the October 14, 2016 Powerpoint Presentation. Silent Running is a potential program implementer for future California IOU Energy Efficiency programs.

Silent Running is supportive of the following programs as candidates for the four required Statewide Downstream Programs:

- 1) Industrial Strategic Energy Management
- 2) Water/Wastewater Pumping Program
- 3) Indoor Agricultural Program (with consideration of expanding this program to include outdoor growth of cannabis)

We would also suggest full consideration of the Commercial Energy Advisor program as a potential Statewide Downstream Program. This was suggested in the governing decision R.13-11-005, p. 63 and provides an opportunity to draw from 3rd Party expertise in the development of innovative, analytically based approaches to seek out new energy efficiency opportunities and projects. The standardized approach to Commercial Customer project origination on a statewide basis would also assist in tackling regional and national chain accounts on a statewide basis, overcoming an existing current barrier where these chains may be approached somewhat differently by each IOU.

Other program areas to consider would be targeted vertical and/or technical market segment programs such as Data Centers, Sports/Entertainment Venues, and/or Hotel/Lodging/Resorts. Data Centers are projected to be a high growth use over the Portfolio Planning period, linking closely to California's leadership in technology. Sports/Entertainment Venues and Hotel/Lodging/Resorts consume a significant amount of energy (and thus represent a significant amount of savings opportunity). Additionally, the "users" of these facilities are an audience that can be educated and influenced about energy efficient practices while visiting the venues, providing additional spillover potential.

The Agricultural SEM proposal, while innovative, is a very new approach for the agricultural segment and would seem more suited for implementation in one utility territory that has high agriculture use with complex applications. The proposed WE&T Career and Workforce Readiness Program does not appear to be a downstream program as defined in the decision and appears to overlap with the Workforce Education and Training Programs already prescribed to be a Statewide Program by the decision.

The Statewide Downstream "Four Elements" proposal does not appear to meet the intent of the ordering language in the decision; nor is Silent Running in agreement that the (D.16-08-019 Conclusion of Law 52) supports the "Four Element" proposal as meeting the requirements for a Statewide Downstream Program. While there may well be a need for considering standardized

elements as set forth in presentation; this seems out of scope with the requirements of Ordering Paragraph 9 of R.13-11-005.

Silent Running appreciates the opportunity to provide input on these proposed Statewide Downstream Programs.

Sincerely,

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