

# Comments on California Central Coast Regional Energy Network's Draft Business Plan

*Submitted by: Center for Sustainable Energy*

*RULEMAKING R.13-11-005, Order Instituting Rulemaking Concerning  
Energy Efficiency Rolling Portfolios, Policies, Programs, Evaluation,  
and Related Issues.*

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California Energy Efficiency Coordinating Committee (CAEECC)

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# I. Introduction

As a mission-driven nonprofit organization, the Center for Sustainable Energy works with policymakers, regulators, public agencies and business as an expert implementation partner and trusted information resource. We help drive the adoption of clean, sustainable energy solutions.



### **Energy Programs**

CSE designs and implements market development programs and provides policy guidance on future investments.



### **Public Sector Services**

CSE provides sustainable energy planning assistance for local/ regional/ national governments, agencies and organizations.



### **Workforce Training**

CSE provides community education, professional training on energy codes, standards and best practices.

## II. Commercial Sector

*The CA Central Coast REN did not provide a Commercial Sector section to review.*

## III. Residential Sector

1. Overall, CSE feels the CA Central Coast REN (3C-REN) business plan is very high-level, making it difficult to evaluate. While it specifies strategies that could overcome previous shortfalls of programs in the Central Coast, it does not specify how the program will address overarching performance barriers seen across the country. The plan relies on Home Energy Score as a motivational tool, but CSE has experience that the HES tool does not generate sufficiently low scores for low-performing homes in California due to the temperate climate.
  - Will 3C-REN work with DOE to overcome this deficiency?
2. The 3C-REN business plan does not address the ZNE future. While the target market of the plan is existing homes, energy efficiency can only do so much. Distributed generation and distributed energy resources must be part of the solution, and CSE would like to see 3C-REN take an integrated approach to that future. Intervention strategies and activities targeting all sectors/target audiences would benefit from a wider view through a ZNE lens.
3. **Pg. 17**, the Multifamily Subprogram should reference AB 802 and address multifamily property owner engagement around benchmarking and data access. Engaging only tenants, as this subprogram description implies, is missing a huge opportunity for savings and compliance with pending reporting requirements.

## IV. Codes and Standards Sector

*The CA Central Coast REN did not provide a Codes & Standards Sector section to review.*

## V. Finance Sector

*The CA Central Coast REN did not provide a Finance Sector section to review.*

## VI. Emerging Technology Sector

*The CA Central Coast REN did not provide an Emerging Technology Sector section to review.*

## VII. Public Sector

*The CA Central Coast REN did not provide a Public Sector section to review.*

## VIII. Workforce Education and Training Sector

### Overarching WE&T Sector Feedback:

- While PG&E is the assigned statewide program administrator for WE&T specific to K-12 Connections and Career and Workforce Readiness, local WE&T efforts, as proposed in other plans, do not focus on similar elements for outreach and engagement, making it very difficult to compare and understand how the different WE&T offerings in IOU territories will complement one another.
1. **Pg. 8**, “Common across all three counties are pockets of urban jurisdictions surrounded by rural agricultural communities. The service area is especially hard to reach in Santa Barbara and San Luis Obispo Counties where rural communities are widely spread. The nature of these communities carries multiple challenges, including dispersed populations and a workforce with limited EE capacity.”
    - What unique strategies and tactics does 3C-REN intend to pursue to create a stronger workforce with EE capacity? What strategies and tactics can go beyond training the existing workforce?
  2. **Pg. 12**, “Regional colleges, trade schools, and workforce development authorities will be engaged to educate and assist with program recruitment.”
    - What current colleges, schools, and workforce development authorities specifically exist in its region? Will 3C-REN prioritize working with certain trade schools or workforce development authorities in the beginning to create a foundational plan or curriculum?

What resources or support mechanisms will 3C-REN provide these entities with whom it plans to partner?

3. **Pg. 16**, “Contractor Engagement: Contractors will be drawn to the program by demand generated in the market through 3C-REN activities. The program will provide resources to lower market entry and upgrade project execution costs. This will further market stimulation as lower costs result in lower prices. Contractors will have the opportunity to participate in local training events that are otherwise prohibitive by the cost associated with extended travel, lodging, and lost revenue. The 3C-REN Energy Coach Service will consist of mentors in the field, and staff will assist with developing tools to raise the level of workforce sophistication in the Central Coast Region. It is important to note that hard-to-reach communities in San Luis Obispo, Santa Barbara, and Ventura Counties are serviced by building firms that tend to be smaller, have fewer resources, and struggle to keep pace with California’s Energy Code. While this program will focus on retrofitting the more than 450,000 homes built before current energy standards, it will also serve to educate builders in modern code and compliance verification concerns.”
  - How will 3C-REN, as a new entity, prove their value to contractors? What are the first things they can do to gain trust, interest, and engagement? The *emPower Program* is mentioned as a success it will leverage. What lessons learned, relationships, etc., will 3C-REN take from that program?
4. **Pg. 19**, “3C-REN will employ a “learn by doing” approach for contractors who are already vetted through the emPower program and the Home Upgrade Program. These contractors will be engaged in the improved business model of the 3C-REN in which they carry out energy improvement projects in conjunction with the REN’s experienced staff. This will allow the REN to line up closely with the existing paradigm, which leans heavily on apprenticeship style training.”
  - What specific skills, knowledge, etc., will the contractors receive from this experience that they will be able to implement on their own moving forward?



As a mission-driven nonprofit organization, CSE works with energy policymakers, regulators, public agencies and businesses as an expert implementation partner and trusted information resource. Together, we are the catalysts for sustainable energy market development and transformation.

HEADQUARTERS

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