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Date: October 27, 2016 at 2:49 PM

Subject: Silent Running Comments and Questions related to the Local Government Sustainable Energy Coalition's (LGSEC) to be the Lead Administer for a Statewide Local Government Program

Thank you for the opportunity to provide comments on LGSEC's Local Government Statewide Administration Business Plan. Silent Running is a potential program implementer for future California IOU Energy Efficiency programs. We have reviewed both the detailed Business Plan and the Powerpoint presentation prepared by LGSEC. Additionally, we attended (remotely) the October 19, 2016 CAEECC Coordinating Meeting at which this proposal was originally presented and the October 27, 2016 dedicated meeting discussing the LGSEC proposal.

Silent Running has a number of questions and requested clarifications related to this proposal:

1. Has LGSEC received firm and/or documented expressions of interest by eligible California Local Governments to have it serve as the Lead Administrator for this program? If so, how many?
2. Is LGSEC supportive of Statewide Administration of Local Government Programs even if they (LGSEC) are not the Lead Administrator?
3. What is the exact scope of end use customer segments (e.g. Residential, Industrial, Public Sector, Commercial, etc) covered by the LGSEC proposal?
4. How, if at all, will the LGSEC proposal be made available to Publicly Owned Utilities?
5. How are the REN's and CCA's to interact with LGSEC over the Portfolio Planning period for the Proposed Local Government Statewide Program? Has this been discussed with the respective REN's?
6. LGSEC's proposal suggests that it seeks to replace IOU administration for all geographic areas where LGSEC administered Local Government programs---across all sectors? Is this a correct interpretation?
7. How does LGSEC's proposal and approach differ from and enhance the Administration role that REN's play?
8. LGSEC cites development of the California Integrated Climate Fund as a primary driver for its proposal. This fund and the integrated approach to climate change mitigation makes good sense. It is unclear whether allocating and commingling CPUC EE ratepayer funds for this purpose is allowable under existing statute. To what degree is this integration more effectively (and legally) achieved through future enabling legislation?
9. Is it LGSEC's understanding that in its proposed Program Administrator role it would be required to contract with a Program Implementer? To what degree does LGSEC intend to contract with implementers as part of its proposed Local Government Statewide Administrative role?
10. Is it LGSEC's understanding that it would be bound to achievement of energy savings and cost effectiveness goals under its proposal (as are other Program Administrators)?

Silent Running appreciates the opportunity to provide input on the LGSEC proposal.

Sincerely,

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resident/Founder

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