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Date: Tuesday, November 22, 2016 at 6:34 PM
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Cc: Ted Pope <TedPope@2050partners.com>
Subject: NRDC comments on LGSEC proposal

Hi Margaret –

I appreciate the challenges that many local governments are facing and appreciate the thought behind your proposed solution. However, NRDC has a few questions and items to consider below. Let me know if you want to discuss.

Best,

Lara

1. The assertions of the identified problems were countered by at least two parties. Until NRDC understands the degree of the challenges, which local governments are most impacted, and in which locations those challenges apply, it is difficult to assess how the proposal will address the challenges without undermining partnerships or approaches that are seemingly working.
2. You raise important issues on p.9-10 that should be addressed, even if not applicable to all partnerships. However, the proposal does not provide a clear path to how this approach would address the key issues. For example, how would this structure improve the data issues?
3. It is not clear in the submission how a statewide lead would be able to maintain the local flare of partnerships.
4. If the proposed fund and strategy only has conceptual support at the moment (p.2), what would happen if that support never manifested? How would that impact the proposal's ability to succeed?
5. We're concerned about the implications that co-mingling funding will have on estimation of savings being attributable to the PA programs. If there is an application process, how would this plan ensure that awardees in SCE territory only get SCE funding, which is the current requirement per the CPUC?