



Local
Government
SUSTAINABLE ENERGY
Coalition

P.O. Box 3629 • Oakland • California • 94609
510/459-0667 • www.lgsec.org

October 2, 2014

Karla Soriano
Opinion Dynamics
VIA ELECTRONIC MAIL

SUBJECT: EM&V Study for 2013-2014 Local Government Energy Efficiency
Partnership Programs

Dear Ms. Soriano:

As directed by Jeremy Battis of the California Public Utilities Commission (“CPUC”), the Local Government Sustainable Energy Coalition (“LGSEC”) provides these comments on the draft evaluation plan for the 2013-2014 local government energy efficiency partnership programs. We appreciate that there are many partnership programs to review, and we hope that you recognize that while there are similarities in the fact that we are all government entities, each jurisdiction has priorities that are developed locally, under the direction of our locally elected governing boards.

As you heard on the September 16 call, local governments are very interested in working with the evaluation team to facilitate the inclusion of as many local government entities as are interested. We take very seriously our responsibility to deliver energy efficiency programs that contribute to California’s energy and environmental goals. We believe that obtaining in-person input from more stakeholders will produce a more robust evaluation that best reflects the diversity of programs. We understand that there will be an online survey; this is not the same as face-to-face discussion. Rather than holding many small individual meetings with a subset of the group, a few meetings open to all stakeholders would be more efficient for the consultant and fair for all the local government partners.

We are concerned that the evaluation would afford more weight to input from utility managers than from the local government staff who every day are implementing these programs, and who know first-hand what is working well and where there are opportunities for improvement. We also are concerned about the representativeness of a sample that is dictated solely by the utilities and CPUC staff.

We note on p. 2 of the *Evaluation Plan* circulated for the September 16 call that there are other studies underway of local government energy efficiency programs. Can you or CPUC staff provide us with information on how local governments will be able to provide input to those studies?

For several years, the LGSEC has urged the CPUC to initiate EM&V studies early in the program cycle. We understand that you do not control the schedule. However, we do wish to register our disappointment that consultation with local government implementers has not occurred earlier in the program cycle, and earlier in your process of developing the study structure.

Finally, we are concerned about the timing of this evaluation study with the news we received earlier this week that the CPUC Energy Division expects to provide authorization for the utilities to update the Menu of energy efficiency options for local governments under the *Long Term Energy Efficiency Strategic Plan*. How will the evaluation you are performing account for these changes that the CPUC is hoping will occur in 2015?

We look forward to working with you and your colleagues on this project. Please contact me with any questions.

Sincerely,

A handwritten signature in blue ink that reads "Jody London". The signature is fluid and cursive, with a long horizontal stroke at the end.

Jody London
Regulatory Consultant

Cc: Joseph Oldham, Statewide Energy Efficiency Best Practices Coordinator