Statewide Local Government Partnership Energy Efficiency Business Plan Proposal

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Preface

As atmospheric carbon dioxide tops 400 parts per million, the State of California enjoys a reputation for climate leadership that extends beyond our national borders to global recognition. The State pursues its ambitious climate goals through multi-sector planning, policy and programming. Implementation of energy and climate programs relies upon a number of actors, and relies heavily upon mandates handed down from State agencies to local governments.

However, the State supports the efforts of local governments and their partners through funding from independent, single-sector agencies, under programs that utilize different criteria, procurement, reporting, and accounting schedules and rules. As a result, the response to a full-spectrum challenge generated by multiple, co-dependent sectors, is a disaggregated approach governed by numerous, disparate administrative, fiscal, operational and functional rules and agencies. The structures of the problem and the responses are misaligned, suppressing the full potential of local government efforts and reducing return on investments.

In 2014, a coalition of local governments (cities and counties), non-profit agencies, and state regulatory representatives (Coalition) convened to develop an optimization and performance model that consolidated the various programs and funds of multiple state agencies, under a central framework that would allow local governments and their partners to propose full-spectrum greenhouse gas emissions reduction projects and programs (the **Integrated Climate Change Fund**, or **ICCF**[1]). This unified approach allows for *complete* projects designed for highest impact and cost-effectiveness; projects that strategically and tactically address all the key sectors combined (e.g., energy, transportation, land use planning, water and waste management).

A number of State agencies have voiced conceptual support for the ICCF concept and model.[2] Through its Commission President and Executive Director, the CPUC took an early lead, identifying the Energy Efficiency Portfolio Local Government Partnership (LGP) Program as an energy sector program ideally suited for this role. At the same time, the Coalition noted that a disaggregated system which lacks fiscal, operational and functional unity - as well as mixed transparency, metrics, access to data and accounting methodologies - depresses optimization of the LGP Program. As part of the Order Instituting Rulemaking for the Rolling Portfolio, a proposal was submitted to standardize the LGPs under a centralized statewide administrative framework that would allow for process improvement and uniformity, enhanced transparency,

[1] See Appendix A for an Executive Summary of the ICCF Model.

[2] The concept and description of the ICCF, included as Appendix A has been discussed with leaders in the various state agencies (California Air Resources Board – CARB, California Energy Commission (CEC), California Public Utilities Commission (CPUC), the Governor's Office of Planning and Research (OPR), the Strategic Growth Council (SGC), the Department of Water Resources (DWR), and the Local Government Sustainable Energy Coalition (LGSEC).

streamlined administration and greater efficiency through continuity, consistency, and reliability – in short, a responsible performance-based model.

In response, the CPUC signaled receptiveness to a thoughtful, positive proposal for change. CPUC Decision (D.) 16-08-019 asked that the Local Government Sustainable Energy Coalition (LGSEC, a program of the Local Government Commission) present the proposal as a formal Business Plan and stated:

> "Local Government Programs may be, but should not be required to be, handled in a statewide manner. We will consider LGSEC's proposal in the context of the business plans, if brought forward through the CAEECC process. Regardless of the LGSEC proposal, all business plans should also include strategies for improving the consistency of LGP administration statewide."
>
> (D.16-08-019, Conclusion of Law 53 at page 104)

This Statewide Local Government Energy Efficiency Business Plan proposes a new administrative, functional and reporting model, and envisions leveraging new funding to add to Local Government Partnerships[3] and increase opportunities for innovation in the future.

[3] The term Local Government Partnerships shall be defined and interpreted throughout this Business Plan to include local agency collaborations and initiatives such as the EmPower Program led by Santa Barbara County.

Summary

The role of local governments in the energy and climate sectors, and their impact in advancing State goals and objectives, is rapidly expanding. Local government-driven programs - such as code enforcement and compliance, energy reach codes, Property Assessed Clean Energy (PACE) financing, Regional Energy Networks (RENs), Community Choice Aggregation (CCAs), and shared procurement – represent broad program area penetration by local governments and an opportunity to optimize the delivery of energy efficiency programs. From formation of CCAs and RENs to local innovative financing products and public resource investments in energy project development (including LGPs), local governments are meeting energy needs through a broader set of interwoven policies and programs, such as: energy and water use efficiency, transportation electrification, local energy generation, land use and energy connections, climate action plans, drought response, community emergency response and resiliency, zero-net-energy (ZNE) building standards, retro-commissioning, and other energy use and awareness innovations.

The concept of centralizing the Energy Efficiency Portfolio's Local Government Partnership (LGP) Programs under a statewide rubric is a key element under the ICCF proposal which seeks to centrally administer local government funding from various state agencies, including the CPUC. This was the foundation for the proposal by the LGSEC (the Statewide Local Government Program Area Proposal) in its response[4] to the May 24, 2016 ALJ Ruling Seeking Approaches for Statewide and Third Party Programs (the ALJ Ruling). The Statewide Local Government Program Area Proposal outlined functional, operational, structural, resource and data-access inconsistencies among the LGP Programs administered separately by the State's four Investor-Owned Utilities (IOUs), defined over-arching advantages to a statewide administration model, and recommended appointment of the Local Government Commission (LGC) as the statewide implementation agency. The LGC, established in 1979, is a well-established and active non-profit organization. The LGC's work focuses on local governments, and has a long history of engagement in energy and climate programs, and provides experience and a demonstrable record of success in policy, program and project development among local governments statewide[5].

In response, the Commission acknowledged potential interest in statewide administration of the LGP Program and opened the door for parties to submit a draft Business Plan by October 18, 2016 under OIR 13.11-005.[6]

[4] Comments of the Local Government Sustainable Energy Coalition In Response to the May 24, 2016 Administrative Law Judge Ruling Seeking Input on Approaches for Statewide and Third Party Programs, filed on June 17, 2016.
[5] The LGC has worked closely with the State of California since its inception as a state commission in 1979. Now a nationally-recognized non-profit, LGC has run technical and other support programs for local governments, relating to energy, climate mitigation and adaptation, community design and resiliency – as well as cross-cutting initiatives that leverage broad expertise, diversify funding sources, and delivery of higher-impact results.
[6] D.16-08-019, Conclusion of Law 53 at page 104.

This draft Local Government Partnership Statewide Administration Business Plan (LGP SW Administration Business Plan) promotes a Statewide Local Government Program Area that responds to trends, provides a performance- and solutions-based program model, and addresses constraints, presumptions, and barriers that have artificially suppressed the full potential of Local Government Programs (LGPs) and, consequently, the Energy Efficiency Portfolio. Also, it meets the Commission's standards and directives for statewide programs: to craft and deploy long-term strategies that advance market transformation over 5-10 years, and provide continuity in program delivery and planned evolutions.[7]

There are findings and parallel developments in the Energy Efficiency Portfolio Business Plan Guidance Decision that support this proposal, for example the Commission's directive to remodel institutional partnerships into a statewide construct under a lead program administrator[8] A number of studies previously funded and assessed by the Commission influenced this decision:

> "Entities with distributed leadership had difficulties planning and executing projects, while entities with a centralized leadership, such as a University of California system, were highlighted for superior achievements and energy efficiency."[9]

This LGP SW Administration Business Plan explores and clarifies actual challenges in LGP Programs, and offers a comprehensive optimization model tailored to maximize outcomes from the investment of ratepayer funds. More importantly, this Business Plan anticipates an expanded scope of Local Government programs (to include EmPower, among other current and future innovations) and abandons the theory of superficial intervention strategies such as:

- Across-the-board cuts to administration & ME&O
- Arbitrary program cuts (that even IOUs who have joint programs in a single jurisdiction, cannot agree on)
- Varied and inconsistent access to energy use data
- Document and process changes, e.g., to financing programs such as OBF, that miss core hurdles of those programs (e.g., OBF caps are insufficient to meet a large % of the commercial building inventory but, simultaneously is not user-friendly to leveraged funding from third-party sources necessary to meet the cost of meaningful upgrades)

Many of these arise from misunderstandings of the public sector and a faulty translation of program barriers[10]. Superficial measures are implemented instead of comprehensive strategic and tactical reforms, e.g.:

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[7] ALJ Ruling Seeking Input on Approaches for Statewide and Third Party Programs dated May 24, 2016 (the ALJ Ruling), p. 4.

[8] D.16-08-019 at page 63

[9] SCE Summary Report: Process Evaluation of the 2006-2008 Local Government and Institutional Partnership Program Final Report, PA Consulting, 2009. See also, Program Assessments Study: Statewide Institutional Energy Efficiency Partnership Programs, Navigant Consulting, 2013.

[10] Barriers associated with the Public Sector by the IOUs are generally categorized as Financial/Procurement, Technical Resource, and Data

Financing and Procurement Barriers – Common concerns are that local governments are risk adverse, focused on greenhouse gas (GHG) reductions rather than energy savings, are bound by time-consuming procurement rules and standards (e.g., Disadvantaged and Minority Business thresholds), driven by annual rather than long-term budgets, and limited by valuation processes that do not recognize ancillary benefits to retrofits. In reality, local governments have:

1) a number of procurement mechanisms developed in great part to streamline long-term complex programs,
2) significant and often unique potential to leverage public, private sector, state and federal grants, alternative, and public-private partnership funding arrangements,
3) like the commercial sector, develop *operational* budgets on an annual basis, but use 5- and 10-year planning for *capita*l improvements; and
4) utilize many of the same risk management principles applied by commercial building owners in assessing capital investments.

Clearly, as the principal actors in developing climate action, sustainability, energy action, emergency response, adaptation and resiliency, and general plans, local governments routinely assess strategies and actions through a direct and co-benefits calculator, especially in the non-transportation energy sector, which typically accounts for 36-50% of GHG emissions. Also, procurement and economic development should reflect the local or regional constituency and equitably incorporate the social profile of a jurisdiction into its energy efficiency programs.

Technical Resource Barriers – We find that many of the cited Technical Resource Barriers[11] are re-statements of alleged Financial/Procurement Barriers. It is our opinion that they do not impose substantive or insurmountable impediments. One factor that stands out as a Technical Resource Barrier (allegedly) unique to LGP Programs is "asymmetric information and opportunism"[12], that results in a series of capacity gaps (e.g., expertise, information, staffing). The Statewide Local Government Energy Efficiency Business Plan fully recognizes this class of barriers, but approaches its remedies from a different and arguably more effective and responsive approach; including cross-jurisdictional and cross-regional partnerships, robust and comprehensive support services for technical, contractual, development and design, marketing, and evaluation needs. Importantly, these services and/or resources will be institutionalized and provide the widespread consistency, continuity and access necessary to support the highest and best performance of the LGP Programs and parity in access to resources and opportunity, and thus meet the CPUC's objectives for statewide program area treatment.

[11] Southern California Edison Draft Energy Efficiency Business Plan - Public Sector, pp. 16-21.

[12] Information, data and opportunity is inconsistent and varies on an ad hoc basis, both among the four IOUs, and even among the LGPs of the same IOU

Data Challenges and Barriers. Conventional thinking about data challenges focuses on asymmetric information and opportunity that creates ambiguity, unreliability and widely divergent data applications and uses. We agree these are the conditions, but differ as to remedies. Access to energy use data is a very significant challenge. A second and related challenge is the quality, discontinuity and inconsistency of energy use data provided to LGPs which impedes measurement, consistency and transparency and undermines effective program development, accurate budgeting, accounting, and measurement. Statewide administration will create responsive yet responsible energy use data sharing, energy use databases and access protocols. Collectively, this model offers significant and important support to program design, continuous evaluation and improvement, EM&V and comparative analyses and reporting on the effectiveness of ratepayer investments.

The LGP SW Administration Business Plan model offers LGP Programs continuity of current programs while building systemic and system-wide improvements that accurately identify and target barriers that inhibit their full capacity and potential. This plan proposes an agnostic yet comprehensive approach, designed to be implemented in phases that align with the rolling portfolio infrastructure and cyclical updates (e.g. the Potentials and Goals Study). The Phases are defined by progressive functional, operational, and developmental transitions and actions. described in Table 1.2, Matrix of Statewide Program Implementation Phases.

SECTION 1: PORTFOLIO SUMMARY

1.A. LOCAL GOVERNMENT PARTNERSHIP PROGRAM OVERVIEW

The first Local Government Partnership (LGP) program was established in 2001 under an agreement between Pacific Gas and Electric (PG&E) and the City/County of San Francisco, pursuant to the 1999 California Public Utilities Commission (CPUC) Energy Efficiency Portfolio Decision[13]. In 2001, the four Investor-Owned Utilities (IOUs) were also directed by the CPUC to increase the number of and expand LGPs in order to advance the State's energy efficiency goals at the local level.[14] As a result, during 2003-2005, the CPUC expanded funding of local government energy efficiency efforts across the State's four Investor-Owned Utilities[15] (IOUs).

The seminal role of local governments in advancing the State's energy and climate action goals was formally established by creation of the LGP Program, and more fully articulated in the September 2008 and January 2011 Updated California Long Term Energy Efficiency Strategic Plan (LTEESP)[16]. Specifically, the LTEESP refers to "significant powers" of local governments, including their authority and leverage to:

- Ensure Title 24 and reach code compliance
- Adopt reach codes and green requirements
- Support high-savings projects that exceed code through favorable fee structures, fast-track permitting, and other innovative incentives mechanisms
- Lead their communities with innovative energy efficiency programs
- Lead by example and demonstrate for other Program Area agencies and actors
- Enact transformational ordinances, such as point-of-sale protocols
- Ensure that local government energy efficiency expertise becomes widespread
- Innovating permitting and zoning codes to create a menu of incentives and mandates

Consequently, over the past 15 years the presence of LGPs in the Energy Efficiency Portfolio has expanded, and is presently represented by 67 existing LGPs, and eight initiate LGPs proposed for launch and funding in 2017 (see Appendix D). Typically, IOU local government programs also include institutional partnerships (e.g., university and corrections systems facilities). These IOU Local Government/Institutional portfolios further include a number of supplemental programs, which account for roughly 17-25% of each IOU's gross Local Government/Institutional funding.[17]

[13] D.99-08-021 (Ordering Paragraph 11)
[14] D.01-01-060, pp. 31-32.
[15] Pacific Gas & Electric (PG&E), Southern California Edison (SCE), Southern California Gas (SoCalGas), and San Diego Gas & Electric (SDG&E).
[16] California Long Term Energy Efficiency Strategic Plan: Achieving maximum energy savings in California in 2009 and beyond. September, 2008. Updated 2014.
[17] Examples of supplemental programs include: Local Government Energy Action Resource (LGEAR) Program, Strategic Energy Resources, Community Energy Partnership, LGP Regional Resources Placeholder, Local Government New Partnerships Program, and Local Government Strategic Planning Pilot Program.

The combined funding of Local Government/Institutional Programs is roughly $90 million annually, yet after 15 years of LGP implementation the IOUs still generally forecast LGP energy and gas savings, as well as demand reductions, as minor compared to the full portfolio. Despite the desire to be high-performing actors in the energy efficiency sector, and to advance local and regional climate response, LGP Programs have been mired in the margins of the Energy Efficiency Portfolio. Cyclical interventions have not produced tangible improvements. Why?

We assert that LPG performance and effectiveness challenges are grounded in the fundamental structure of LGPs, and not the nature of their programs or the capacity of LGs to implement them. The table below identifies some of the factors that have contributed to less-than-optimal outcomes for LGP Programs across the four IOU portfolios:

Table 1.1: Performance Barriers and their Consequences

Factor	Consequence
Inconsistent Purpose and Mission	LGP objectives and roles are inconsistent (statewide and intra-IOU), and fluctuate arbitrarily between resource and non-resource activities.
Lack of predictability in mission, contracting, goals, and programming	LGPs have little or no participation in the development of programs and implementation methodology. Contracting schedules and terms vary, inter-IOU and intra-IOU. Lack of IOU engagement with LGs on design, budget and implementation undermines transparency and disrupts effective program implementation.[18]
Budgets can vary year-to-year. Many are experiencing significant reductions (see Appendix D)	Contracts and budgets vary arbitrarily from year to year, causing discontinuity in effective programs and market uncertainty on the ground.
Passive vs. Active Role and Implementation	LGPs are assessed and measured according to the performance of programs wholly created by others, including design, content, implementation, branding, budgeting, and scheduling. Intervention strategies tend to focus on design or operational nuances and do not solve or substantially mitigate underlying structural and performance barriers.
Inconsistent operational structures	LGP structure and operations vary arbitrarily, along with implementation staffing, third-party implementation partnerships, and technical support.

[18] For example, the IOU 2017 Budget Advice Letters filed September 1, 2016 include the first communications to certain LGPs of entire sub-program cuts. Also, PG&E's 2017 Budget Advice Letter includes across-the-board, substantial cuts to the Administration and Marketing and Outreach Budgets of all LGP Programs (see Appendix B): between 15% and 50% in Administration and between 54% and 90.5% in Marketing and Outreach). While there may be logic and planning behind cuts this sudden and this deep, there is no explanation of replacement strategies that will keep essential administration and ME&O actions whole and sustain rigorous program implementation.

Failure to link LGPs with cross-functional programs	LGPs often operate in isolation, and are not integrated with cross-functional programs such as financing. This compartmentalization ensures program impacts remain minimal.
Inconsistent data access	Access to end-user data remains arbitrary and systemically limited, undermining LGP ability to design, target, assess or refine programs. Additionally, data access has other negative consequences for local government climate action planning and greenhouse gas emissions inventory programs.
Limited Growth and Development	LGP capacity and performance is impacted by the lack of meaningful growth and development activities.
Inadequate resourcing of a key resource for best-practice sharing (SEEC).	With additional funding the SEEC program could be more effective at sharing and proliferation of best practices, policy and technical knowledge.
Local governments with limited resources but good EE opportunities remain under-served	This balkanizes energy efficiency across the State.
Multi-IOU programs are not resulting in better coordination and improved outcomes	Burdensome bureaucracy, conflicting objectives, varying investment and absence of any process for contract modifications has limited effectiveness

The status quo has evolved from a disaggregated and fractured approach by the four IOUs and has inadvertently created a network of programs lacking a comprehensive, consistent, reliable, performance-based system. As a member of the statewide Executive Committee organized by the Natural Resources Defense Council to develop a proposal to the CPUC for transition of the Energy Efficiency Portfolio from a 2-year cycle to a "rolling portfolio" cycle, the Local Government Sustainable Energy Coalition (LGSEC) convened LGPs (LGSEC members and non-LGSEC member LGPs) to identify the three driving priorities/needs for LGPs in better executing programs and delivering savings under the Energy Efficiency Portfolio. These goals are identified and more fully described in the LGSEC report for LGPs submitted to the Executive Committee August 2014, a copy of which is attached as Appendix C.

The CPUC recognized the barriers inherent in the LGP Program structures, and has specifically directed that "all business plans should also include strategies for improving the consistency of LGP administration statewide."[19] We think the most effective remedy to the CPUC's concerns would be to fold LGPs under a common administrative framework in a consolidated, statewide, performance-based program. This begins to realize the vision for the ICCF.

[19] D.16-08-019, Conclusion of Law 53 at page 104.

1.B. Statewide Performance-Based Model

Overview of Phased-In Implementation

Objective: Reorganizing the LGPs from a model of disaggregated purposes and inconsistent operational and functional frameworks to a statewide model with consistent purpose, administration, operation, function and opportunity. This statewide system will use performance-based criteria and protocols, and focus on strategies that gradually decrease reliance on ratepayer-funded incentives but increase energy savings (Statewide Performance-Based Proposal). The proposal reforms the LGP structure to meet these objectives and these two over-arching goals:

1) Highest and best use of ratepayer funds through performance and fiscal optimization of LGP Programs, and
2) Provide a foundational model for the integration of multiple funding streams and systems, in order to accelerate the State's energy and greenhouse reduction goals, as referenced earlier in the ICCF framework.

Approach: This conversion will align with the 10-year cycles envisioned by the California Public Utilities Commission (Commission), using 3-year phases synchronized with the triennial Potential and Goals Study cycle to allow for benchmarking, assessment and adjustments as necessary:

Table 1.2 Statewide Program Implementation Phases

Launch Year 1: Build Operational Systems and Relationships		
Establishing	**Implementing**	**Evaluating**
Interim governance and oversight mechanisms Processes and procedures to operationalize statewide administrative systems, and to refine LGP, IOU, CPUC roles and responsibilities and budgets Allocation assessments and analysis of budget elements	Statewide Program administration Continuity in existing contracts, budgets and relationships through the rolling portfolio cycle Interim governance and oversight mechanisms Program design and assessment workshops among existing and potential LGP entities and all key stakeholders Operational agreements with administration and implementation resources Development and implementation of the ICCF with other State agencies	LGP Supplemental/Support Programs data resources and responsible data sharing

Phase 1 (Years 2-4): Functional Optimization and Funding/Financing Expansion		
Establishing	**Implementing**	**Evaluating**
Convene stakeholders to refine new paradigm model Convene stakeholders to create a "Map of the World" to identify logical/optimal roles, responsibilities and actions among LGPs, Regional Energy Networks (RENs), Community Choice Aggregators (CCAs), and other non-partnership LG programs (e.g., EmPower) to create an integrated, complementary, and cross-supportive programmatic system[20]. This will be informed by CPUC goals (e.g., third-party implementer participation), Investor-Owned Utility (IOU) objectives and duties, and best and highest use of ratepayer and other public funds. Develop cross-program energy sector integration, e.g., increase leveraged and cross-program development of energy efficiency with IDSM and DG/DER initiatives, climate mitigation and adaptation plans, and enhanced resiliency in the energy sector.	Integrate CPUC directives, e.g., Potential and Goals Study, into Phase 1 activities Refine data-gathering and data-sharing frameworks Launch featured "pilots", e.g., emerging technologies, IDSM, multi-jurisdictional, cross-IOU pilots testing DER/DG models Build public-private partnerships Institutionalize public-private partnerships, e.g., PACE Expand the Commission's statewide energy financing apparatus through leveraged funding and private-sector financing of energy programs Condition local governments for development and implementation of preferred resources programs	Assess program incentive levels and alternative, non-cash incentives Enhanced transparency under this SW administration model will ensure responsible, compliant use of ratepayer energy efficiency funds, while promoting the performance of those funds through program and project leveraging under the energy and climate sectors.

[20] This is not to suggest that those other programs (e.g., RENs or CCAs) would be rolled under the LGP SW Administration Program, but that the performance of each will be enhanced by mapping logical roles, eliminating gaps, and avoiding potential conflicts or duplication.

Phase 2 (Years 5 - 7): Strategic Development of Integrated Energy/GHG Programs		
Establishing	**Implementing**	**Evaluating**
Develop and launch performance-based programming Develop integrated systems (regulatory and non-regulatory elements)	Develop marketing, education and outreach on successful financing models Expand financing models and partnerships Align successful funding and financing models with reduction of ratepayer incentives True-up Potential and Goals objectives, and participate in updated Potentials and Goals Study Implement preferred resources programs	Assessment and report out on Phase 1 featured pilots, including best practices, energy savings and GHG reductions, and best-in-class studies

Phase 3: (Years 8-10): Merger of Regulatory/Non-Regulatory Partnerships		
Establishing	**Implementing**	**Evaluating**
Pilot low/no-incentive programs	Institutionalize best-in-class program criteria and resources Align goals with CPUC objectives for third-party implementation	Report out Phase 2 objectives, milestones and products True-up Potential and Goals objectives, and participate in updated Potentials and Goals Study

I.C. Budget

Consistent with the Phased-In Implementation Framework set forth above, the LGP SW Administration model will carry over existing LGP contracts and budgets while simultaneously engaging the LGPs in essential transitional activities and retooling administrative systems. During the transitional Launch Year 1, the Program Administrator and Implementer(s) will prioritize:

- Clarify Full, Integrated Existing Budgets. Review of existing filings demonstrates the difficulties in full and accurate understanding of LGP Program budgets and expenditures across all program elements, including all IOU costs associated with LGP administration that are not reflected in the LGP budgets themselves
- Clarifying LGP Roles, Responsibilities and Budgets: Presently, sometimes net budgets are allocated as gross budgets, without reflecting clear breakdowns between LGPs and IOU Third-Party vendors, which are fundamental to assessing performance levels and impacts.
- Functional Allocation Assessment: Analysis of Budget Elements, i.e., administration, ME&O, Non-Incentive Direct Implementation, and Direct Implementation Incentives; and how costs are defined and applied across these elements. A key part of this analysis is mapping dollar-to-market impacts.
- Analyze LGP Supplemental/Support Programs. As noted above, across the four IOUs, roughly 22-23% of the gross combined budgets have been allocated to support/supplemental programs (e.g., LGEAR, Strategic Energy Resources, Community Energy Partnership, LGP Regional Resources Placeholder, Local Government New Partnerships Program, and Local Government Strategic Planning Pilot Program). Clear understanding of the use and dollar-to-market impact of these funds and programs will serve as one platform to support LGP expertise in developing future budgets and accurately projecting performance metrics.

For a number of reasons (some summarized above) this iteration of the LGP SW Business Plan defers construction of an actual proposed budget table until there is clarification of direct and indirect costs budgeted by the IOUs relating to LGP Program budgets, including those allocations that are not stated, not clear or not comprehensively detailed in the available filings.

However, this LGP SW Administration Business Plan proposes the following additional budget placeholders, to allow for: 1) initial pilot program funding supporting competitive Emerging Technologies/IDSM proposals; and 2) initial design, architecture and data population costs associated with the creation of a statewide energy use database. This database is proposed for exclusive direct use by a party identified by the State's legislative and regulatory authorities as

an eligible agent for the deposit and analysis of energy use data, using standards and scales mutually developed and reviewed by the CAEECC and authorized by the Commission. This system will be more fully defined and described in the Implementation Plan following this submission or, if directed by the Commission, in a subsequent iteration of this LGP SW Administration Business Plan.

Emerging Technologies/IDSM activities	$ 1,697,696.00
Data Resource Development – one-time initial architecture, construction and vendor privacy compliance[21]	3,680,000.00

This is a request of first instance for the LGP Programs, and is proposed under a competitive procurement administration that prioritizes energy savings, cost-effectiveness, innovation, impact on hard-to-reach markets and "challenge" market sectors (e.g., multifamily rental). Funding will be awarded by close of the calendar year, for carry-forward implementation. This process will also pilot performance-based systems, criteria, and processes and further inform and refine the proposed Statewide Local Government Partnership Program.

I.D. Energy Savings/Performance Metrics

As noted above, all four IOUs have submitted 2017 Advice Letters that forecast no or minor impact by LGPs in energy and gas savings, or demand reduction, using different templates and different levels of granularity[22].

The CPUC has dedicated significant resources toward studies to analyze evaluation, measurement and valuation of the LPG Programs. Chapter 1.1 (Local Government Partnerships) of the CPUC's 2016-2017 Draft EM&V Update Plan provides a summary of several 2013-2015 (combined cost $1,240,000) and 2015-2016 (combined cost $643,000) EM&V studies commissioned to assess various aspects, elements and outputs of the LPGs, and further summarizes a number of proposed 2017 LGP Program studies (budgeted at $985,000).

Although the studies have provided greater understanding of LGP operations, functionality with other implementers, resource and non-resource characteristics, geographic outcomes, and other matters, the 2016-2017 Draft EM&V Update Plan acknowledges persistent difficulties with fundamental aspects, including but not limited to assessing performance, comparative analyses, and defining the value of LGP processes. We observe that it is difficult to gather a full

[21] Annualized costs of data resource deployment currently estimated at $4,228,000, with potential zero net funding impact through funding as part of existing LGP Support/Supplemental Program budgets.

[22] E.g., The PG&E AL assigns 18% of its total 2017 Program budget to LGPs with a projected energy savings impact of 7%, 5% in demand reduction, and 1% in gas savings; and Southern California Edison's AL assigns 6% of its total 2017 Program budget to LGPs with a projected energy savings impact of 2%, and a 1% impact in demand reduction. The 2017 Projected TRC and PAC valuations vary widely among the LGPs and attribute highest value to the LGEAR sub-program, but collectively do not meet desired thresholds.

overview of LGP savings performance and cost-effectiveness attributes from the IOU September 1, 2016 Advice Letters for the Proposed 2017 Budgets. The four IOUs use different approaches, values, table templates, and categories to map LGP/Institutional spending and projections.

The consolidated statewide approach offers uniform and consistent budget and outcomes reporting that will greatly enhance transparency and clarity regarding LGP Program action, performance and measurement. This approach will promote the utility and scope of the LGP EM&V studies, and increase the cost-effectiveness of the studies themselves. Also, this approach will allow Local Governments to use a full-spectrum menu of metrics and data resources that will provide greater:

- Certainty, clarity and predictability that is essential to strategic program and project design
- Fluency and exercise in leveraging other CPUC, state agency, private sector, and local government programs and funding
- Ability for continuous – rather than cyclical – review of programs and flexibility to adjust and refine programs for performance
- Accurate measurement of program performance and comparative analysis and reporting

These are important transitions for the LGP Program, and they will embolden the Energy Efficiency Portfolio and productivity of ratepayer funds. By way of example, this expanded metrics menu would include:

- Savings Goals Achieved: Translated through GHG reductions, energy and gas savings, and demand reduction.
- Leveraged Resources: Values associated with leveraged alternative funding and cross-cutting programs (CPUC and other programs)
- CPUC Program Goals and Targets: Savings metrics associated with other CPUC Programs, such as IDERs, IDSM, LCR, RFOs, DRPs, and DER/DG, where values definition is expanded to include certain environmental and societal impacts
- Cross-Collateralizing Other State Goals: From cross-deployment of other programs, initiatives and local government implementation plans, LGP Program impacts contributing to other State legislative and regulatory goals, such as those under (updated) SB 350, AB 32 (California Global Warming Solutions Act of 2006), SB 375 (Sustainable Communities Strategy and Climate Protection Act of 2008), AB 758 (Existing Building Energy Efficiency Act of 2008), and AB 802 Building Energy Use Disclosure Act).
- Diversified Scale Metrics: Including, for example, exo-local impacts, coordinated joint programming statewide by multiple LGPs, penetration into all state regions and hard-to-reach and/or disadvantaged communities.

- Joint Resourcing Among LGPs: Joint resourcing and resource-sharing among LGPs as a mechanism for leveling access, participation and performance across LGPs[23]
- Building Spectrum Participation: Building inventory cross-over, covering public buildings, private buildings, cross cutting, with other preferred resources utilized.
- Self-Sustaining Program Pathways Identified: Consolidating the LGP Program promotes and has the potential to accelerate development of traits and model for self-sustaining programs, where reduction of ratepayer-funded incentives and/or programs is a clear goal.
- Streamlined Processes: processes streamlined compared to current (hiring, procurement of services, contracting for consulting/project implementation, project management), includes other sources.

1.E. Cost Effectiveness

This iteration of the LGP SW Administration Business Plan defers quantification or orders-of-magnitude projections for cost-effectiveness until the parties have the opportunity to clarify numerous ambiguities and to obtain critical budgeting and EM&V information that is unclear or missing from existing documents[24].

The LGP SW Administration model deploys a combination of operational, functional and programmatic efficiencies that will reduce costs and amplify performance, and stimulate greater cost effectiveness among the Partnerships, including but not limited to:

- Reduced administrative duplication
- Improved efficiencies through consistency
- Continuity of LGP programs that currently experience ad hoc delays and interruptions
- Reduced costs of reliability and ability to plan procurement and contractor relationships
- Levelization of access and opportunity among LGPs
- Reduced time and resources necessary for basic functions
- Joint procurement
- Data access systems that are responsible (meet privacy baselines) but also provide datasets compatible with strategic design, routine assessment, and

[23] This could also involve strategic mapping of LGP hierarchies: start-ups launched with minimal resources outside of CPUC funding; mid-level that have developed organizational structures, resources and other assets; and mature programs that have built a broad knowledge base, have significant dedicated resources, executive level support and regional influence.

[24] For example, there are a number of support Programs budgeted by the IOUs under the LGP Program budgets but how those funds are applied or accounted is not defined. Also, in certain cases, a large portion of energy savings projected for the LGP Programs are attributed to these support programs rather than the Partnerships.

effective course corrections in program development and implementation and market segmentation
- Administrative and program frameworks that support skills and growth dynamics among staff
- Regional and statewide production and sharing of program resources, e.g., ME&O, case studies, official and public presentations
- Uniform processes and systems that support comparative analyses and improvements
- Easy access to and upscaling of financing options
- Lower costs because of the elimination of payments to shareholders

The LGP SW Administration Business Plan proposes the use of current methods for estimating cost effectiveness through the first phase of the program (launch year through year 3) to ensure consistency with current contracts and programs.

1.F. Narrative Description of Changes to Existing Program

The motivation behind a statewide, performance-model LGP SW Administration model is grounded on five over-arching challenges:

i. **Integration Catalyzes; Segregation Inhibits**. Local governments must further the State's greenhouse gas emissions reductions, energy, water, and sustainability goals. Many have created fully-integrated implementation plans to do so. However, uncoordinated multi-agency, siloed approaches to grants, funds, and opportunity forces local governments to compartmentalize – not integrate – implementation. The system inadvertently acts to impede, rather than advance, realization of energy, climate and sustainability goals.

ii. **Barriers to Success Should be Acknowledged and Corrected, not Tolerated**. The number of and investment in LGPs has risen considerably over the past 15 years. Even so, there is persistent tolerance of barriers embedded in the system and indifference to local government recommendations for enhancing productivity. Inadvertently, a system has emerged that presumes marginal performance *as a characteristic*.

iii. **Develop Strategic and Holistic Intervention Strategies**. Superficial intervention strategies are insufficient to address LGP implementation barriers and optimize the potential of ratepayer funds in LGP Programs.

iv. **Recognize and Fully Utilize LGP Assets**. Local Government assets and resources have not been fully mined by the LGP Program, and inhibiting characteristics have not been repositioned to reverse that effect. In addition, prior portfolios

(and current filings) miscast local government characteristics as liabilities, when in fact they can be/are assets, e.g., risk management and procurement standards.

v. **Recognize Multi-IOU Administration Conflicts, Duplication, and Inconsistencies as a Cautionary Tale.** The 2017 EmPower program, which is based on three IOUs' jointly funding and engaging in a regional program, has been hampered by one IOU withdrawing their funding and participation. In the course of program implementation, disagreements between the IOUs constrained program implementation due to IOU lack of coordination, increased bureaucracy and related additional time and effort, short-term (1 year) contracts, 11th hour contract execution, last minute changes and the absence of any formal process for LGs to seek and secure contract modifications.

By way of illustration and explanation, the following Integrated Statewide Framework Map (Table 1.3) addresses key barriers to and defects of the existing LGP Program Model, and highlights key changes under a Statewide Performance-Based Model and their impacts:

Table 1.3 Integrated Statewide Framework Map

Statewide Model Strategy	Existing Framework	Timing	Impacts of Change	Cross-Policy / Program Benefits
One Realm Instead of four IOU Territories	LGPs are currently governed by one of the State's four IOUs, pursuant to service territory boundaries.	Launch Year 1	Greater administrative cost-effectiveness Ability to combine and leverage customer service resources of all 4 IOUs Streamlined administration offers the Energy Division complete perspective and operational advantages and efficiencies	LTEESP
Seamless leveraging of LG energy, sustainability, climate action, resilience & adaptation plans and implementation	LGPs are constrained mainly to a single sector (energy), a single aspect (energy efficiency), and a single application (climate mitigation)	Launch Year 1 Phase 1	Greater gains through leveraged resources, staff, and funding Accelerated gains to meet ambitious State targets and schedules Model that catalyzes outcomes rather than inhibits them CPUC emboldened role and influence over State's full suite of energy, water, climate, and sustainability goals	AB 758 LTEESP AB 375 SB 350 AB 32 AB 802 ZNE Distributed Generation Distributed Energy Resources
Continuity, Consistency, and Enhanced Measurability and Refinement	The 4 IOUs apply different standards and systems for contracting, program design, data access, LG purposing, developmental participation, evaluation and reporting	Launch Year 1 (Systems Development) Phase 1 (Launch Application)	True and accurate comparative analyses / enhanced transparency Greater clarity and reliance for EM&V studies LGs uniformly participate in data access, program development and evaluation Reliability and predictability enhance LG program implementation and outcomes	LTEESP SB 350 AB 802 ZNE

Statewide Model Strategy	Existing Framework	Timing	Impacts of Change	Cross-Policy / Program Benefits
Standardized, Enhanced and Responsible Data Access	The 4 IOUs share data using inconsistent standards and criteria, both Inter-IOU and intra-IOU	Launch Year 1 (Systems Development) Phase 1 (Launch Application)	Enhanced program performance Critical resource parity across all LGs Uniform standards for data-sharing[25] Critically-informed program design, continuous evaluation and improvement	AB 302 AB 350 ZNE
Leveling of cross-LGP capacity and function	Lacking a gaps analysis, the LGPs represent widely variable levels of capacity, staffing, resources and output	Launch Year 1 (Analysis) Phase 1 (Launch Application)	Resource pools, toolkits, key skills training and joint procurement Optimization of Administration, ME&O and Non-Incentive Implementation funds Explore expanding agenda, resources, and scope of SEEC Parity in regulatory support	LTEESP AB 375 AB 350 AB 32 ZNE
Remediation of Local Government Barriers	IOUs presume that risk aversion, political dynamics, and decision-making processes are inherent defects, not potential assets of LGP Programs	Launch Year 1 (Analysis) Phase 1 (Launch Strategies)	Deploy preemptive mechanisms LGs commonly use to streamline operations and increase effectiveness and responsiveness Identify where other existing LG programs provide access to meaningful tools/resources Drive/identify consensus on energy priorities across regional and supra-regional territories Cultivate engagement and consensus among elected officials/ administrators	LTEESP AB 375 AB 350 AB 32

[25] A number of practical, highly-useful, outcomes-oriented yet responsible (privacy) models have been considered under the OIR proceeding (Order Instituting Rulemaking), R. 14-08-013e.g., provide data on a U.S. Census Block Group levels.

Statewide Model Strategy	Existing Framework	Timing	Impacts of Change	Cross-Policy / Program Benefits
Promotes LGP Constituency and Market Reach	The existing LGP Programs (across all 4 IOUs) predominantly constrain LGP under improvement of government facilities, code enforcement, and ME&O support	Launch Year 1 (Convening) Phase 1 (Launch Strategies)	Exploits all existing LG constituent relationships Cross-utilization of intra-government data systems Optimize market segmentation and other targeting mechanisms Embeds energy efficiency into other key LG initiatives such as affordable housing, etc. Expands and centralizes building inventory databases Engages LG-labor programs and relationships	AB 758 LTEESP AB 375 SB 350 AB 32 AB 802 ZNE Distributed Generation Distributed Energy Resources
Pilot Program, Program design clinics, Best-In-Class and BMP Library	Does not presently exist as a full-spectrum statewide program	Launch Year 1 (Convene/Design) Phase 1 (Launch Strategies)	Further leverages parallel State goals (climate, resilience, water) Supports cross-sector, inter-agency model under “catalytic integration” approach Expands knowledge content to national and international sources Expands access for parity and uniform knowledge and skills building Combined, enhances energy savings, program performance, cost-effectiveness and optimization of ratepayer funds	AB 758 LTEESP AB 375 SB 350 AB 32 AB 802 ZNE Distributed Generation Distributed Energy Resources

State Goals, Strategies and Objectives

More specific to the above Table 1.3, the Statewide Performance-Based Model differs from the existing LGP Program Model and rigorously cross-supports the State's driving energy policies, legislation and goals including:

- ***AB 758 Existing Buildings Energy Efficiency Action Plan*** **(Action Plan)** lays out a 10-year roadmap to mobilize market forces and transform California's existing building stock into high performing and energy-efficient buildings. The Action Plan envisions the public sector playing a critical leadership role in creating a new statewide commercial benchmarking and disclosure program, encourages local government innovation, and calls on local governments to shape better energy codes for existing buildings *without limiting local government reach to government facilities*. The Statewide Performance-Based Model untethers local governments from strict application to public facilities only, and thus opens LGP Program penetration into building inventories that account for up to 95% of a jurisdiction's greenhouse gas emissions and typically 75%-85% of a jurisdiction's total energy use.

- ***California's Long-Term Energy Efficiency Strategic Plan*** **(LTEESP)**, includes a dedicated chapter that discusses the pivotal role of California's 500+ local governments in furthering energy efficiency and leading communities to ZNE. The CLTEESP envisions that by 2020 local governments will be leaders in employing energy efficiency to reduce energy demand and GHG emissions both in their own facilities and throughout their communities. The CLTEESP update (January 2011) sets a 50% goal for all local governments to have a full suite of energy/climate action/sustainability plans being implemented and tracked by 2015, increasing to 100% by 2020. These substantive directives from the State's over-arching strategic energy plan clearly point to the higher efficiency and value of integrated planning, programming and implementation.

- ***SB 350 Clean Energy and Pollution Reduction Act*** mandates a 50% renewable energy content in the state's overall electricity mix and a doubling of energy efficiency goals for existing buildings by 2030. The law directs the CPUC to review and update its policies to achieve the annual targets, as well as make revisions to the Renewable Portfolio Standard program necessary to ensure compliance with the State's recently updated 2030 targets. As noted above, California's energy market is experiencing a rapid and pervasive trend toward local government energy procurement (community choice aggregation, or CCA) and renewable energy proliferation (e.g., PACE programs). As legislatively acknowledged Program Administrators, it is reasonable to assume that CCA Authorities will soon merge procurement, renewable energy market penetration, and energy efficiency into merged business and implementation plans, and will coordinate and collaborate with LGPs and Regional Energy Networks in order to map out strategic and tactical frameworks for advanced renewable and efficiency performance.

- ***SB 375 Sustainable Communities and Climate Protection Act*** requires local governments to implement long-term integrated planning of land use and transportation, to reduce per capita GHG emissions. Local Governments have taken a leadership role statewide in sustainability planning and implementation, in parallel coordination with climate adaptation, emergency response, and long-term resilience protocols. The energy sector is a keystone of each of these community planning initiatives, and offer leveraged staff, organizational/collaborative frameworks and relationships, funding, and other resources to catalyze energy program performance.

- ***AB 802*** mandates use of metered data for measurement of impacts from energy efficiency program interventions, which establishes a vital pathway for robust market valuations of building energy performance based on actual impacts. This represents a data bank that local governments that use to exercise unique jurisdiction and authority (e.g., labeling ordinances), and to publicly translate and share the impact of deferred maintenance on business operations, operations budgets, building performance, building values, and tenant/customer impacts. In addition, Program Administrators can now receive credit for energy savings from, and provide incentives and support for, energy efficiency projects that help public sector entities meet current energy code requirements. Where, previously, the Energy Efficiency Portfolio inherently segregated the public and private sector markets, the Statewide Performance-Based Model now offers the opportunity for a comprehensive approach to code development, permitting, tracking, and enforcement.

- ***SB 32 and AB 197*** were recently approved by the legislature and signed by the Governor. They increase the state's carbon emissions reduction target to 40% below 1990 levels by 2030. The California Air Resources Board will be responsible for implementing the bill, which will include GHG emission reduction standards. Local governments define how they will comply with this standard in their Climate Action Plans, which comprise many elements including energy efficiency actions, and which can leverage many of the strategies proposed in this business plan to better serve their communities.

- ***ZNE Legislation*****.** Recently adopted legislation, in addition to newly emerging legislative and policy initiatives, will rapidly accelerate the ZNE transformation in California over the ten-year planning horizon of this Business Plan. The state defines a ZNE building as one that "produces as much energy as it consumes over the course of a year, when accounted for at the energy general source." California's current ZNE goals include:
    - All new residential construction is required to be ZNE beginning in 2020 (LTEESP)
    - All new commercial construction is required to be ZNE beginning in 2030 (LTEESP)
    - Up to 50% of existing buildings retrofitted must achieve ZNE by 2030 (LTEESP)

- Any proposed new construction or major renovation of State buildings larger than 10,000 square feet must use clean, on-site power generation such as solar photovoltaic, solar thermal and wind power generation, and use clean back-up power supplies (Executive Order B.18.12)
- The Energy Division's Summary of Program Ideas for LTEESP updates seeks to "develop and participate in regional efforts to reduce energy use and encourage ZNE buildings in local government operations and in the community. Regional efforts allow for shared resources and expertise, economies of scale for energy efficiency services and products, and coordination and alignment of goals" (Goal 4, Strategy 4.4).

All of the above-described ZNE goals are more readily facilitated and advanced by LG Programs empowered by consolidated administration which fosters collaboration, shared resources and knowledge, and responsible access to data, while strategically deploying their local building and development regulatory authority.

Section 2 – Sector Strategies

The LGP SW Administration Business Plan proposal envisions all of the sectors (residential, commercial industrial, agriculture and cross-cutting) encompassed within the Public Sector, as that is the context of this state-wide LGP administration proposal.

An overarching goal of the SW Administration proposal is to address the systemic barriers to LG energy efficiency program performance, and then to implement consistent, transparent methods for determining cost-effectiveness across the differing energy utilization profiles across different regions and sectors.

The general goals, strategies and approaches for program administration for each of the sectors is the same.

The following table (Table 2.1, Intervention Strategies) summarizes identified problems, intervention strategies and approaches, desired market effects, baselines and multi-year goals.

By its nature, the proposed State-wide program ensures state-wide coordination.

During the first phase, broad stakeholder engagement will ensure inclusion of multi-sector and diverse stakeholder goals, objectives, concerns and priorities. These should include:

- environmental and economic justice,
- fair labor practices,
- access to program design information,
- responsible access to and use of energy data, and
- technical and policy engagement resources

By its nature, the proposed State-wide program influences activities and results across all sectors. State-wide administration and implementation of robust LG programs cuts across residential, non-residential, public and private sectors.

2.1 Intervention Strategies

Problem Statements/Intervention Strategies

***Short-Term = 1-3 years ¤ Mid-Term = 4-7 Years + Long-Term = 8-10 Years**

Problem Statement	Ten Year Vision	Desired Market Effects	Intervention Strategies	Market Effect Metrics	Baseline	Metric Source	Short-Term Target *	Mid-Term Target ¤	Long-Term Target +
LG roles in driving state's EE objectives and goals are not fully or consistently defined or utilized	LGs lead collaborations and stakeholders[26] to implement cross-program initiatives, e.g., clean energy, DER, GHG reduction LGs leverage CPUC funding with other public/private capital	Resource challenges (financing, technical and data) are accurately identified and resolved Optimization of LG and LG-Partner program performance and cost-effectiveness	LGP Statewide Administration Expand LGP funding and financing options Transparent, common metrics for evaluation and reporting of LGP programs 10-year, three-phase SW administration and implementation plan	Diversification of savings and outcomes[27] State objectives tracked and achieved: SB350, SB 32 and AB 197, SB 375, AB 758, AB 802, ZNE Spillage[28] Training/outreach metrics Economic impact metrics	‡ Current LGP baselines to be developed for each of the Market Effect Metrics described, as part of Year 1 Launch	Launch Phase Participation Levels	TBD	TBD	TBD
LG programs are limited to gov't building retrofits, code enforcement, and direct-install projects	LGs lead communities in innovative, cross-cutting, multi-sector programs[29]	LGs leverage CPUC funding with other capital sources LGs increase EE opportunities for all building types	Expand LGP roles in long term EE Strategic Plan goals Build LGP and IOU partnership roles /rubric under Statewide Administration[30]	Building Spectrum Participation [31] Increased energy savings across building and program sectors.	‡ Current LGP baselines to be developed for each of the Market Effect Metrics, in Year 1 Launch	Launch Phase Participation Levels	TBD	TBD	TBD

[26] For example, elected officials, other public agencies, constituents, utilities, energy service and product providers, special districts, private/public financing entities, and other regulatory bodies

[27] Specifically, GHG reductions; therms, kW, and kWh savings; funding and resources leveraged from other sources; savings realized from cross-cutting programs (Residential, Non-Residential, Codes and Standards, Commercial, and Disadvantaged Communities.

[28] i.e. The amplification of program uptake that is the consequence of actions or influence of a partner or element in the Program. We share Southern California Edison's recommendation to develop a methodology and metrics-set for quantification/qualification of spillage.

[29] E.g., GHG reduction, clean energy programs, Distributed Energy Resources, and future grid management programs.

[30] Enhanced LGP-IOU Partnership that incorporates existing resources (financing and incentives, core program elements, IOU tools and resources that service LGPs, tracking of energy savings in LGP projects and programs, use of IOU controlled data, etc.).

[31] E.g., public buildings, private buildings, cross cutting, other preferred resources utilized

Problem Statement	Ten Year Vision	Desired Market Effects	Intervention Strategies	Market Effect Metrics	Baseline	Metric Source	Short-Term Target *	Mid Term Target ¤	Long Term Target +
LG financing and business solutions have not been developed and applied	LGs leverage internal and third party financing options, and offer streamlined access to a full menu of low-cost, easy access financing and procurement options	Joint procurement under SW Admin SW use of standardized contracts Preemptive qualification of qualified vendors and contractors Procurement standards that reflect State and local diversity and values[32] Diverse, accessible funding options	Identify streamlined procurement strategies used by LGs Poll LGs for joint procurement opportunities Develop standard terms, conditions, metrics, and methodologies for procurement and contracting under LG SW Admin Identify impact of procurement standards on local economy Build financing options and third party partnerships	Decreased procurement and contracting timelines Streamlined admin costs of procurement and contracting Increased number of funding options that serve residential, non-residential, commercial and other EE programs Self-Sustaining Program Pathways Identified[33] Savings associated with elimination of shareholder payments	‡ Current LGP baselines to be developed for each of the Market Effect Metrics described, as part of Year 1 Launch	Launch Phase Participation Levels	TBD	TBD	TBD
LGs are under-utilized for developing and implementing new energy policy and legislation	LGs have an active, established role in crafting State energy policy, reach codes, enforcement and compliance actions Multi-agency coordination or consolidation of GHG-reduction programs	Energy policy keeps pace with LG innovation, such as PACE and CCA Energy policy anticipates cross-sector and cross-cutting infrastructure for climate adaptation and systems resilience	LGP SW Admin includes an active role for LGs in program and policy development Establish an advocacy-lobbying-intervention-representation entity for LGs	Increased committee participation Number of integrated GHG programs and funding Other Programs Participation: DERs, IDERs, IDSM; LCR RFOs, DRPs, Distribution level, Transmission level	‡ Current LGP baselines to be developed for each of the Market Effect Metrics described, as part of Year 1 Launch	Launch Phase Participation Levels	TBD	TBD	TBD

[32] This proposal rejects the concept that equity-based standards such as Disadvantaged or Minority Businesses are impediments to procurement but, rather, that they advance corresponding State standards and more accurately reflect local and regional socio-demographic characteristics and the diverse profile of individual and commercial ratepayers.

[33] Sampled traits and indicators for self-sustaining programs: self-hired resources, investment of direct and leveraged funding, internal organization developed/grown, program growth indicated.

			Pooled multi-agency funding programs that support GHG reduction						
Problem Statement	**Ten Year Vision**	**Desired Market Effects**	**Intervention Strategies**	**Market Effect Metrics**	**Baseline**	**Metric Source**	**Short-Term Target ***	**Mid Term Target ¤**	**Long Term Target +**
Inconsistent management, assessment & reporting of LG Programs, across and within IOU service territories	LGs, public agencies, and gov't programs are centrally and consistently administered under an LGP SW Admin Program, that promotes performance, cost-effectiveness, and matrixed management of cross-supporting programs and goals	LGPs and partner Programs demonstrate sector diversity, market penetration, address multiple State objectives, and feature consistency, reliability, resource parity, and transparency[34]	LGP SW Admin establishes common management, metrics, measuring and reporting systems LGP SW Admin creates parity in access to resources and data LGP SW Admin closes resource gaps for rural and under-served territories	Aggregated processes and systems LGP SW Admin economies of scale quantified Transparency: performance metrics clear, calculations understood, clear goals, short/mid/long term goals Use and utility of data resources Saturation into underserved areas	‡ Current LGP baselines to be developed for each of the Market Effect Metrics described, as part of Year 1 Launch	Launch Phase Participation Levels[35]	TBD	TBD	TBD
LGs have qualified, but under-resourced staff and under-resourced programs vs. the scope and scale of their goals	All LGs and public agencies are leading by example and are able to design and implement clean energy, EE and other strategies that significantly improve LG facilities energy efficiency and reduce GHG emissions	A growing number of public agencies complete EE and clean energy projects, and expand share of upgraded facilities and assets	Growth of local innovative programs among LGs statewide Increased development and utilization of Regional Energy Networks Consistent use of core IOU energy programs Development of programs utilizing third-	Energy savings achieved as a % of the public sector EE potential; % of enrolled agencies within territory; % of enrolled agencies serving disadvantaged communities; % of eligible agencies completing EE projects within territory; % of participating agencies highly satisfied with Statewide Program administration	Energy efficiency baseline and potential TBD Total number of eligible agencies as of 2018	Metered energy savings; agency participation numbers; participating agency satisfaction survey results	**TBD**	**TBD**	**TBD**

[34] Elements, indicators and outcomes of Programs may include administration of state, federal funding and other resources, regulatory reporting, fiduciary reporting, results and effectiveness reporting, prioritization of state and regional objectives, CPUC oversight and coordination, evaluation of programs, statewide, regional expansion of programs, data management, high level IOU coordination, satisfaction of all regulatory requirements, overall program administration, provision of needed statewide resources.

[35] Includes multiple source references, e.g., CAL Enviro Screen data on disadvantaged and hard to reach communities

			party public and private sector financing for use by LGs						
Problem Statement	**Ten Year Vision**	**Desired Market Effects**	**Intervention Strategies**	**Market Effect Metrics**	**Baseline**	**Metric Source**	**Short-Term Target ***	**Mid Term Target ¤**	**Long Term Target +**
Inconsistent capacities for assessing and communicating energy efficiency benefits, and mobilizing the community in energy action and initiatives	LGs actively lead and engage their communities to reduce energy use and GHG emissions (cross-sector)	A growing number of LGs are engaging and educating their constituents about clean energy programs efficiency and strategies	SW Admin library of ME&O assets, messaging, case studies, presentation materials, and Implementation Plan resources[36] Develop Energy Atlas resources statewide, using SW Admin energy use database Development of regional, public agency technical resource programs	% of LGs actively engaging their communities on clean energy programs ME&O metrics, e.g., market impressions % of LGs actively engaging their disadvantaged communities Increased % of energy customers in community who participate in IOU core programs	Number and market metrics of currently participating LGs under LG Partnerships		**TBD**	**TBD**	**TBD**
Limited and/or inconsistent resources to develop and adopt reach codes; and to increase compliance and enforcement of existing codes	LGs develop and adopt model codes and reach codes and actively encourage, require and promote clean energy actions within their communities Complementary revenue streams (e.g. from CCAs) may supplement LGs code dev and enforcement programs	There is widespread activity by LGs to develop and adopt model codes and reach codes. The SW Admin facilitates sharing of best practices and success cases to actively promote the diffusion of innovation	Code development informed by energy use and building data (Energy Atlas) Develop shared regional, code compliance and enforcement resources. Develop stream-lined energy project permitting guidelines and manuals (regionals and statewide) Adoption of model energy codes, standards and policies	# of LGs adopting reach codes/standards % of LGs participating in shared, regional resource programs and streamlined permitting manual programs Scale of industry stakeholders' participation[37] Measured performance in code enforcement improvements, code compliance improvements	Baseline to be developed on local code enforcement and compliance; intervention strategies in-place, and number of LGs actively engaged in reach code development and/or regional, shared resource code programs		**TBD**	**TBD**	**TBD**

[36] Envisioned to also include comprehensive education and action plan development on integrated demand side management, zero-net-energy, and distributed energy resources.

[37] In development of data programs and shared technical resource and permitting manual programs

2.B. Examples of Innovations and Pilot Projects and Best Practices which could be Copied or Expanded

Supporting robust technical resources:

- SoCalREN's Public Agency Technical Support program aggregates technical resources for use by all public agencies as opposed to LGP dollars used to fund hiring for every city/county
- BayREN's Codes and Standards Program provides aggregated Code Enforcement and Compliance resources for use by multiple jurisdictions
- EmPower Tri-County aggregator of residential EE upgrade resources for a three-County region, utilizing local outreach to stakeholders

Supporting access to financing (for public agency projects):

- SoCalREN provides a Public Agency lease financing program accessible to all public agencies for all energy projects which is ideal for stand-alone financing and leveraging On-Bill Financing
- SoCalREN provides a Revolving Loan Fund accessible to all eligible public agencies which acts as bridge-financing for On-Bill financing; OBF provides funding AFTER completion of projects, the lack of bridge funding to start projects is a hindrance to LGs.
- LGC and other local governments are working with the State Infrastructure Bank to provide Statewide financing for LG building projects.
- LGC can assist all LGs with applications to other funding sources like the CEC's Low Interest Government Loan program – IOUs cannot assist with financing applications.

Supporting data consistency and access to data:

- Coordinate access to data under the CPUC's Data Access rules which allow research institutions access to IOU comprehensive, disaggregated consumption data – as SoCalREN and UCLA have done in creating the Los Angeles County Energy Atlas.

To address ways that public sector customers can leverage their community respect and authority to continue to promote higher EE standards, promote code compliance, lead by example, and lead their communities:

- IOU Core Programs (LGs can still have a strong role in doing this)
- Leveraging PACE for core IOU programs – especially in residential and commercial PACE markets
- Promotion and enhancement of code enforcement and compliance through BayREN-like Codes and Standards program and Los Angeles' Solar/Energy Action Group (SEAC) which are not merely code training programs but address specific needs such as lack of

resources, technical expertise, and non-streamlined/universal permitting guidelines for jurisdictions.

- Education, promotion and outreach to the public and communities about Distributed Energy Resources, Integrated Demand Side Management Programs, Local Capacity Restriction Request for Offers, Distributed Energy Resource Pilot Programs, Net-Zero-Energy, Pay for Performance Programs, CA Building EE goals.
- Benchmarking and Reporting ordinance development and other "reach" codes.
- Coordination of unique intervention strategies with core IOU programs.

Conclusion

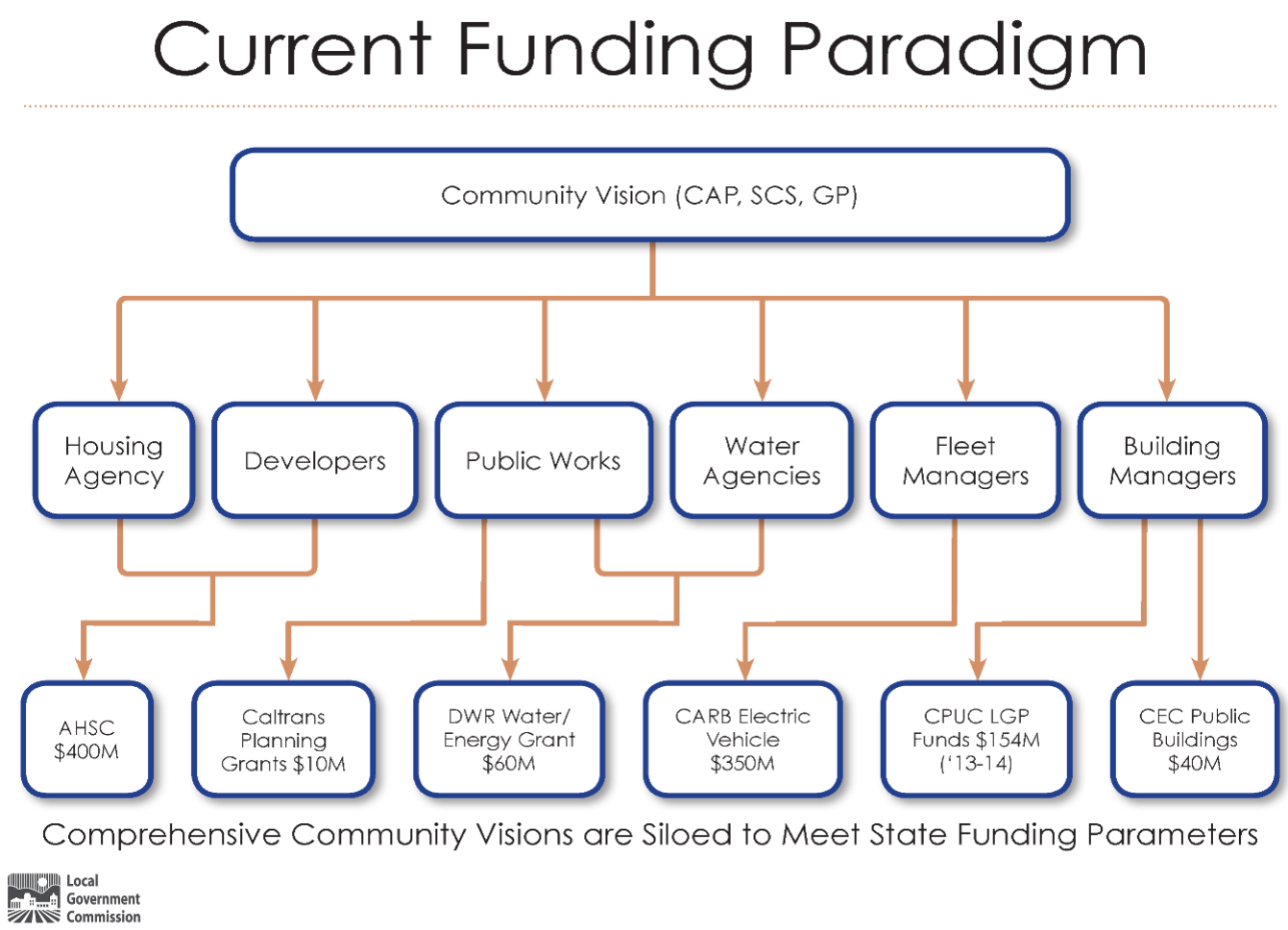
This proposal's genesis is in local governments and the mandates they hold to meet the State's energy and climate goals. These goals can't be accomplished within current funding frameworks. Furthermore, the CPUC's consideration of statewide energy efficiency program administration opens the door to an opportunity to consolidate and harmonize important elements of the IOU efficiency programs: data access and utilization, contracting terms and timeframes, cost-effectiveness methodologies, etc. This proposal represents a crucial pillar of the larger State-wide, multi-faceted ICCF.

This proposal responds to the CPUC's request, and offers a framework addressing the need for efficient use of rate-payer funds through a consolidated, statewide approach to program administration – enabling consistency, transparency and effective diffusion of best practices.

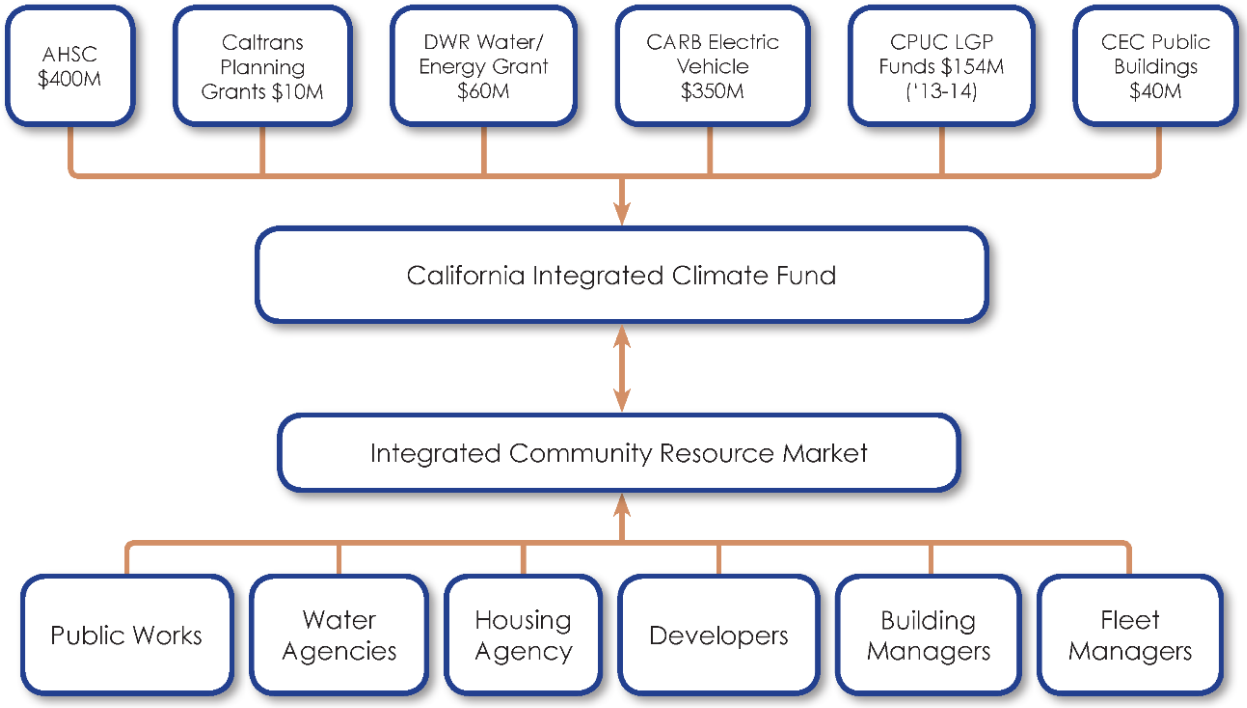
Finally, the creation of a consolidated statewide administrative system enables local governments to access other funding sources (public/private partnerships, agency funding, etc., to further accelerate progress on California's important climate and energy goals.

Appendix A:

Integrated Climate Change Fund (ICCF) Business Plan



Goal: Integrated Climate Funding Market



Local Government Commission

Integrated Climate Change Fund (ICCF)

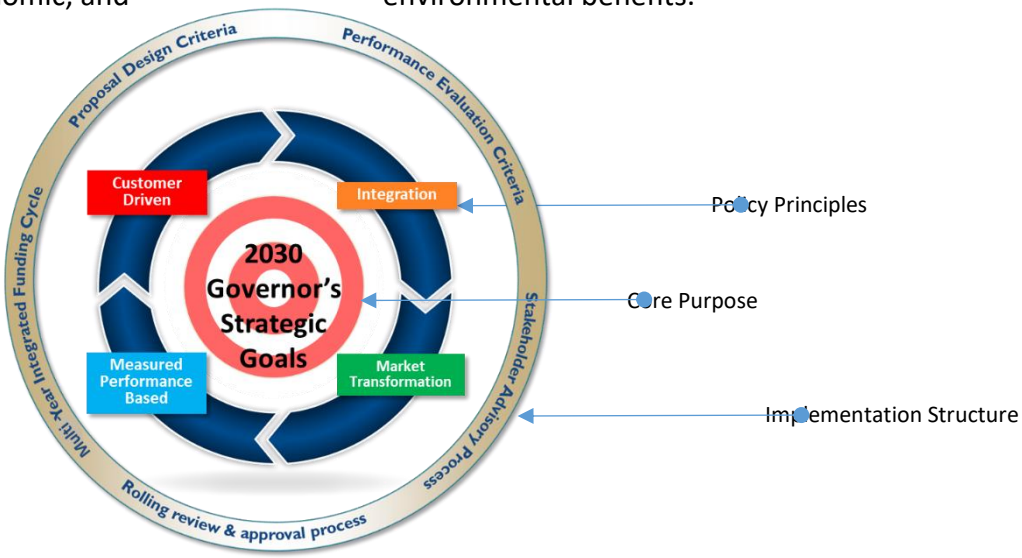
OBJECTIVES

The Local Government Integrated Climate Change Fund (ICCF) would be available to all 482 California cities, and 58 counties and nonprofit partners acting on behalf of local governments.

- Reduce GHGs and furthers the purposes of AB 32;
- Meet statutory requirements;
- Maximize benefits to disadvantaged communities;
- Provide accountability and transparency; and
- Support consistency among agencies administering GGRF funds.

PROPOSED FRAMEWORK

The following framework serves as foundation for designing and evaluating priority ICCF investments that will help California achieve its greenhouse gas reduction goals while realizing additional health, economic, and environmental benefits.



THE CORE PURPOSE

The core purpose of the ICCF is to fund local government integrated resource strategies that align with the State's strategic goals to drive GHG reductions and combat climate change. Funded programs will define strategic goals that result in quantifiable GHG metric tons avoided. ICCF's core purpose is guided by four integral policy principles to ensure the effectiveness and efficiency of fund investments.

THE POLICY PRINCIPLES

- ***Customer Driven:***

Successful proposals should be framed around the needs of the customer. Business plans should clearly define and identify how to meet customer needs which in turn should drive market wide adoption.

- ***Integration****:*

ICCF requires coordination across all State Energy Agencies in an effort to achieve significant GHG reduction most efficiently and effectively by establishing a cohesive State-wide GHG reduction policy. Similarly, at the programmatic level, program design should integrate all fuel and resource types. Policy and programmatic Integration will help mitigate duplicative efforts and market confusion.

- ***Performance Based:***

ICCF funded programs must be substantiated by measurable performance metrics, not estimates. Examples of performance metrics include metric tons of GHG avoided, cost per ton of avoided GHG, pollution-related health cases per capita, and number of clean energy jobs created.

- ***Market Transformation:***

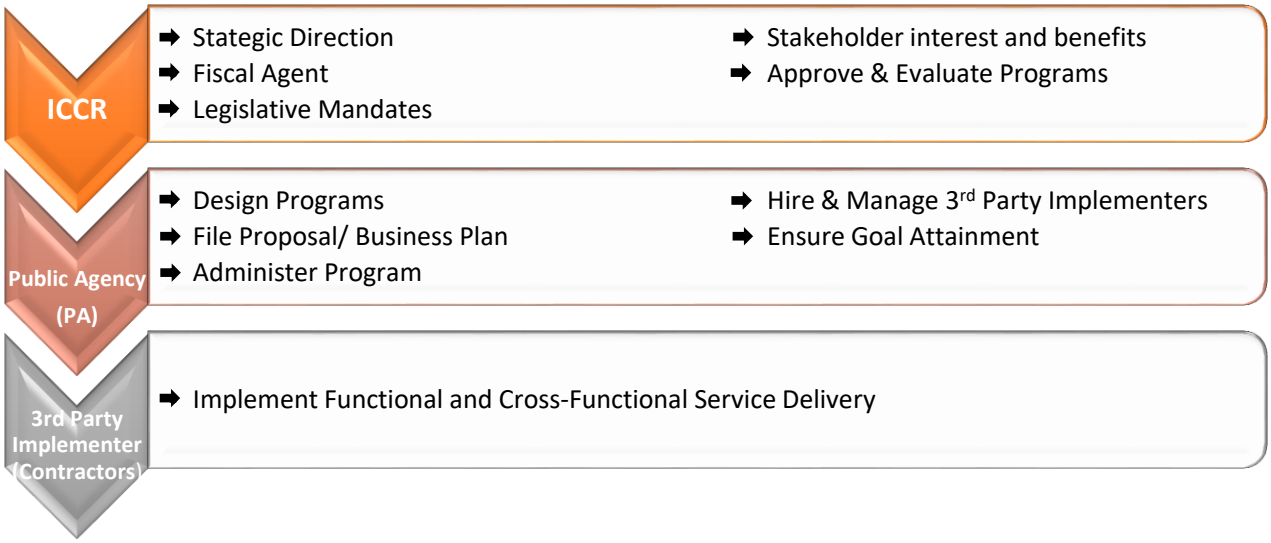
Successful program designs will drive market structural changes leading to sustain adoption of technologies and practices that eliminate GHG emissions. Sustained market transformation due to these programs is achieved when low GHG emission products and practices become more cost effective than high-emission alternatives.

THE PROPOSED IMPLEMENTATION STRUCTURE

Applications for ICCF funding will be in the form of a Business Plan. The key components of the Business Plan are:

- Defined Proposal Evaluation Criteria
- Defined Target Outcomes
- Defined Performance Metrics
- Stakeholder Advisory Group Engagement & Defined Stakeholder Roles
- Periodic Rolling Review & Approval Process

KEY STAKEHOLDERS & ROLES



OVERVIEW

California has thrived by advancing ambitious environmental goals and developing groundbreaking policy and cutting-edge technology. Moving forward, California must integrate its energy and climate action planning and implementation to ensure the state's ongoing economic security, growing prosperity and environmental sustainability.

The state has already demonstrated economic growth is compatible with well-balanced energy and environmental programs. However, attaining California's ambitious energy and environmental goals will require a whole new level of innovation – strategies, technologies and partnerships yet unexplored. To foster this level of creativity requires elasticity and flexibility while maintaining transparency, accountability, and measurable outcomes in line with state priorities. Broad participation of local jurisdictions is a key element to drive fundamental changes in sustainable energy in communities.

Local governments are **key players** in meeting the state's energy goals and shaping energy strategies in their communities. They are uniquely suited to be stewards of **decentralized, integrated, community scale demonstration projects** that support community energy security and resiliency.

Local governments have been recognized as **instrumental in meeting state climate and energy legislation** aimed at reducing greenhouse gas emissions (including Executive Order B-30-15, AB 32, SB 375 and California's Renewables Portfolio Standard). Two-thirds of greenhouse gas emissions are related to the built environment (building energy use and transportation) most of which is controlled by local land use and development decisions that the state delegates to cities and counties.

Existing community visions (as expressed through climate action, sustainable community and general plans) provide a roadmap of **integrated measures that enable the local jurisdiction to reduce greenhouse gas emissions and increase resiliency.** This comprehensive vision is then fractured across a

number of different local departments to pursue separate state grants that can fund single measures or a component of a larger project. Each grant has different criteria, metrics, applications, processes, and timing. This is a **compartmentalization framework** that commonly discourages uptake and is a **key barrier** to local government frustrates multi-jurisdictional partnerships, costs significant public dollars and runs counter to optimal performance and return-on-investment.

Local Governments repeatedly express frustration with the CPUC and other state agencies' grant funding processes that require them to traverse a mountain of red tape. By better coordinating and aggregating both state and local resources into an **integrated funding platform** to streamline the application process, local governments can more readily access and expedite implementation of strategies to achieve deeper savings and economies of scale.

The purpose of the Integrated Climate Change Fund (ICCF) is to enable local governments to access funding through **a centralized process** that will support strategies to achieve a persistent and substantial reduction in GHG emissions. By combining funds across resource sectors, local governments can implement strategies that integrate energy efficiency, renewables, energy storage, EVs, and other GHG mitigation initiatives into a comprehensive solution for a low carbon and resilient local energy system, and cost-effective savings.

At the local level, jurisdictions can **"unshelf" their plans** and identify priority projects that can be bundled for private and public investors. This approach could better capitalize on market momentum in areas such as renewable energy (e.g. Property Assessed Clean Energy providers), energy efficiency, infill development (e.g. forming Enhanced Infrastructure Financing Districts), water conservation (e.g. the Windsor Pay as You Save program) and shared mobility.

VISION

California cities and counties playing a leading role in ensuring ***energy security, resiliency, and a robust low carbon economy*** *for their communities.*

MISSION

Through a centralized GHG fund, mobilize local governments into action to deliver community-scale, integrated, decentralized and performance-based climate change solutions that support the vision for energy security, resiliency, and robust low-carbon local economies.

SOURCE OF FUNDS

The funds will be by various agencies currently managing carbon outcomes including the CPUC, CEC, CARB, DWR and other State agencies.

Aggregating across state agencies and pooling funding from related grants across State agencies that support sustainable community measures (such as the Affordable Housing Sustainable Communities, DWR Water/Energy, CARB low carbon transportation and CEC public building grants) would allow local governments to submit **integrated projects with one application.**

Local jurisdictions would apply through a streamlined process similar in spirit to the UC system, which allows students to apply for numerous UC campuses with one application. The CPUC is committed to providing seed funding and supporting the development of a state aggregated funding platform.

Funding cycle:

Amount: TBD

ELIGIBLE AGENCIES

California's 482 cities and 58 counties.

TARGET OUTCOME

A key outcome is **regional GHG reductions** through funding of local government pilot projects that address energy security, resiliency, sustainability and strong local economies.

Appendix B: Administration and Marketing and Outreach Budgets of all LGP Programs

LGP Program	Administration	Marketing Outreach	Direct Implemen.- Non-Incentive	Direct Implemen- Incentives	Total D.I. Impact	Total Budget Impact
AMBAG	↓ 33%	↓ 68%	+ 50%	≠ change	+ 23%	+ 5%
East Bay	↓30%	↓ 85%	≠ change	↓ 47%	↓ 28%	↓ 34%
Fresno Cty	↓ 50%	↓ 90.5%	↓ 47%	+ 30%	↓ 15%	↓ 30%
Kern Cty	↓ 46%	↓ 84%	↓ 24%	+ 50%	+ 5%	↓ 11%
Madera	↓ 15%	↓ 88%	↓ 37%	+ 32%	↓15%	↓ 29%
Marin Cty	↓ 43%	↓ 75%	+ 5%	+ 50%	↓ 20%	↓ 4%
Mendocino/ Lake Cty	+ 10%	↓ 58%	+ 255%	+ 240%	+ 250%	+ 195%
Napa Cty	↓ 30%	↓ 77%	+ 15%	+ 13%	+ 14%	↓ 2%
Redwood Coast	↓ 22%	↓ 67%	+ 45%	≠ change	+ 23%	+ 4%
San Luis Obispo Cty	↓ 33%	↓ 65%	+ 53%	+ 9%	+ 40%	+ 19%
San Mateo	↓ 26%	+ 48%	+ 81%	≠ change	+ 45%	+ 46%
Santa Barbara	↓ 40%	↓ 86%	↓ 18%	+ 17%	↓ 4%	↓ 17%
Sierra Nevada	↓ 38%	↓ 74%	+ 11%	+ 4.5%	+ 7.5%	↓ 4.5%
Sonoma Cty	↓ 33%	↓ 80%	+ 12.5%	+ 46%	+ 31%	+ 4.5%
Silicon Valley	↓ 20%	↓ 80%	≠ change	+ 20%	+ 9%	↓ 6%
San Francisco	↓ 43%	↓ 54%	+ 7.5%	↓ 29%	↓ 9.5%	↓ 20%

Appendix C: Appendix C: LGSEC report for LGPs submitted to the Rolling Portfolio Executive Committee August 2014

ROLLING PORTFOLIO REFRESH
ROLE AND PRIORITIES OF LOCAL GOVERNMENT PARTNERSHIPS

A number of proposals are being considered by the Portfolio Refresh Committee as a new Rolling Portfolio framework that responds to existing problems and barriers and allows for a continuous portfolio cycle. New approaches to programs have been suggested that consolidate the existing 13 programs according to customer/end-user, prompting a discussion on how Local Government Partnerships (LGPs) might be integrated into the Rolling Portfolio model. The LGSEC has conducted a series of meetings, polls and interviews with LGSEC member governments that implement IOU Partnership Programs. In addition, the LGSEC has reached outto non-LGSEC members with IOU Partnerships (collectively, Committee LGPs). These efforts have produced unanimous or near-unanimous consensus, resulting in the following position statement.[38]

LGP Role in a new Portfolio Model: Regardless of what portfolio program structure is adopted, the Committee LGPs held unanimous in preserving Local Government Partnerships as a discrete program. These Partnerships have, however, identified three (3) critical portfolio elements as essential to a unified, high-performing LGP Network:

- ***Evaluation/Cost-Effectiveness***. ***A clear, equitable and relevant mechanism for evaluating local government programs is needed***. ***Existing processes, as well proposed portfolio structures, present the likelihood of an inappropriate, harsher standard of evaluation for LGPs; or, in the alternative, one that does not fully or accurately account for these Programs.***

  The existing structure, as well as any proposed remodel of the Rolling Portfolio, does not utilize a proper and fair evaluation of the cost-effectiveness of LGPs, and approaches to how cost-effectiveness is calculated for government-implemented programs is insufficient. Under the present as well as proposed portfolio structures, most programs "buckets" are either broad enough to average energy savings across program components, or narrow enough to represent a single component (e.g., Lighting) that conventionally produces significant savings over costs. Existing evaluation approaches fail to calculate that LGPs:
  - Cover hard-to-reach markets
  - Involve substantial non-resource programs
  - Support under-served customer markets
  - Deploy substantial ME&O and social marketing campaigns

[38] While these efforts did not reach every existing Local Government Partnership statewide (regardless of membership in the LGSEC), they incorporate Partnerships serving more than 1/3 of the State's population, spanning all 4 IOU service territories.

- Are directed to behavioral programs
- Are assigned, rather than independently develop, programs
- Serve as local and regional energy "clearing houses" for energy, serving all customers, commonly acting as a referral to other IOU Programs
- Aggregate energy services to communities through a multiplicity of local government programs, policies and objectives, e.g., climate action plans, resource conservation programs, environmental foot-printing initiatives

- ***Present and proposed portfolio models lack local government engagement, both at the program development and program assessment phases. A clear process for deciding programs and budgets is needed. Participation by local governments in the design, role and evaluation of programs will yield higher-performing, more cost-effective programs***
  - Commonly, LGPs inherit or are assigned programs developed by other parties under a regulatory apparatus that does not engage Partnerships as experienced implementers. This extends beyond mere program design, to objectives, metrics, and goals
  - There is a lack of consistency and clarity in how Local Government Programs are developed, assigned or supported, whether across IOUs or within an IOU service territory (this includes both on-ramping and off-ramping of programs)
  - There is a lack of consistency and clarity in how Local Government Programs are evaluated, whether across IOUs or within an IOU service territory

- ***Access to Disaggregated Data is essential. Local governments are confident that a number of options exist that will allow access to down-scaled data under a framework that is responsible and accountable. Free access to energy use data by zip code is non-effective.***
  - Non-IOU implementers and administrators are forced to "fly-blind" in the development, implementation and improvement of programs. This adversely impacts cost-effectiveness and performance
  - Potential options include:
    - A statewide system that deploys academic or research institutions for centralized collection and analysis of data. These actors (exempted by legislation) would respond to requests by local governments that would not personally identify consumers and would be governed by a mutually-negotiated non-disclosure agreement[39], but have true application
    - Allow for production of consumer energy use data as a condition of participation in programs (again, subject to agreements that preserve consumer privacy)

Lastly, we anticipate questions as to how tangible as well as intangible outputs of local government programs might be measured and calculated, or suggestions that they cannot be fully calculated. In this regard, we suggest that parties consider the cost of duplicating these programs and total outputs through private sector actors. In many cases, the actions and contributions of local governments (see above under Evaluation) simply cannot be duplicated, but it is clear that Partnerships represent lower costs for higher, more comprehensive outputs. The gap between the cost of LGP implementation channels and private sector implementation channels is just one calculable value proposition of local government implementation in the energy efficiency portfolio.

[39] We stipulate "mutually-negotiated" because existing IOU non-disclosure agreements are structured for the private sector and include provisions that exclude governments, but can be redrafted to meet consumer privacy considerations and government operations

Appendix D: List of 2017 Local Government Partnerships

2017 Local Government Programs

New 2017 Partnerships

PACIFIC GAS AND ELECTRIC	Local Government Partnerships
• Association of Monterey Bay Area Governments (AMBAG)	
• East Bay Energy Watch	• Sierra Nevada
• Fresno	• Sonoma County
• Kern County	• Silicon Valley Energy Watch
• Madera County	• San Francisco City/County
• Marin County	• North Valley
• Mendocino/Lake County	• Sutter Buttes
• Napa County	• Yolo County
• Redwood Coast	• Solano County
• San Luis Obispo County	• Northern San Joaquin Valley
• San Mateo County	• Valley Innovative Energy Watch
• Santa Barbara County	
SOUTHERN CALIFORNIA EDISON	**Energy Leadership Partnerships / ELP**
• ELP Program	• Orange County Cities
• City of Beaumont	• San Gabriel Valley
• City of Long Beach	• San Joaquin Valley
• City of Redlands	• South Bay
• City of Santa Ana	• South Santa Barbara County
• City of Simi Valley	• Ventura County
• Gateway Cities	• Western Riverside
• Community ELP	• High Desert Regional
• Eastern Sierra	• West Side
• ELP Strategic Support	• Local Government Strategic Planning Pilot
• Desert Cities	• North Orange County Cities
• Kern County	• SANBAG
SOUTHERN CALIFORNIA EDISON	**Government Core Energy Efficiency Partnerships**
• County of Los Angeles	
• County of Riverside	
• County of San Bernardino	
SAN DIEGO GAS & ELECTRIC	**Local Government Partnerships**
• City of Chula Vista	• SANDAG Partnership
• City of San Diego	• SEEC Partnership
• County of San Diego	• Emerging Cities Partnership
• Port of San Diego	

SOUTHERN CALIFORNIA GAS	Local Government Partnerships
• Los Angeles County	• Local Government Energy Efficiency Partnerships
• Kern County	• New Partnership Program
• Riverside County	• Local Government Regional Resources Placeholder
• San Bernardino County	• Gateway Cities
• Santa Barbara County	• San Gabriel Valley COG
• South Bay Cities	• City of Santa Ana
• San Luis Obispo County	• West Side Cities
• San Joaquin Valley	• City of Simi Valley
• Orange County	• City of Redlands Pilots
• SEEC	• City of Beaumont
• Community Energy Partnerships	• Western Riverside Energy Partnership
• Desert Cities	• LGP - NOCC
• Ventura County	• LGP - SANDAG