

Comments of the Local Government Sustainable Energy Coalition on EM&V Report on 2006-2008 Local Government Energy Efficiency Partnerships, Non-Resource

The Local Government Sustainable Energy Coalition appreciates the opportunity to comment on the draft EM&V report (“Draft Report”) on the 2006-2008 non-resource energy efficiency programs operated as part of local government energy efficiency partnerships. The statewide prospective offered in the Draft Report is helpful to us as entities that develop and implement programs tailored to our communities. In particular, the LGSEC appreciates the recognition in the Draft Report that the local government programs are still developing.

There are several findings in the Draft Report that resonate for the LGSEC. For years, the LGSEC and individual local governments have been advocating that greater information exchange among local governments, particularly around best practices, would be beneficial. The LGSEC would like to assist in developing mechanisms to follow up on the recommendations in the Draft Report around standard definitions, tracking systems, etc. Given the high level of local government involvement in developing and implementing these programs, we must be involved in how these tools evolve. As an example, on the January 6 webinar, the evaluators discussed how leave-behind materials and follow-up tools they found so useful they recommend it to other programs across the state was developed by Community Youth Energy Services, a community-based organization that is part of the East Bay Energy Watch in PG&E’s service territory.

The Draft Report recommends developing a more consistent approach across partnerships as to how definitions and methods are used. The LGSEC agrees that shared understandings are valuable and could, in some cases, save time and resources in terms of not having to invent tracking systems or procedures. We are concerned however, that too much standardization in program tools will lead to standardization in program design and delivery. We request that the evaluators and the California Public Utilities Commission (“CPUC”) preserve the flexibility for local government programs to have opportunities to innovate and design programs that best meet the needs of the diverse communities in California.

The LGSEC appreciates the finding in the Draft Report on the positive correlation between involvement of program staff and program effectiveness (i.e., personal touch). This “personalization” is a benefit of local government partnerships that LGSEC has for many years discussed in regulatory venues; we are gratified to see it recognized in the Draft Report. This finding in the EM&V report for non-resource programs is consistent with a finding in the draft EM&V report on resource programs run by local government partnerships. In particular, that report has a finding that the Community College partnership program thrived when it was moved administratively to a different office in which it had a champion. This opportunity for personalization is part of the value of local government – leadership, attention to local issues, personal relationships.

The LGSEC is disappointed that the evaluation process did not begin earlier in the program cycle. In preparing for the 2006-2008 program, the LGSEC had recommended that evaluation should begin early in the program cycle so evaluators can better understand and

integrate changes that occur to a program as it is implemented. We hope that this can occur with the 2010-2012 program cycle.

In sum, the LGSEC finds that the draft EM&V report on non-resource local government energy efficiency partnership programs strikes an appropriate balance of recommended rigor and understanding of the learning curve for partnership programs. The LGSEC stands ready to work with the CPUC, utilities, and other market participants to develop tools and systems that can be used by all local governments as we develop energy efficiency programs that are tailored to our individual communities. We also are happy to take the lead in organizing meetings and other venues for sharing best practices information among partnerships within a utility service territory and also statewide.