



California Energy Commission DOCKETED 12-EPIC-01
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October 2, 2012

California Energy Commission
Dockets Office, MS-4
Re: Docket Number: 12-EPIC-01
1516 Ninth Street
Sacramento, CA 95814-5512
Via email to docket@energy.ca.gov

Comments of the California Center for Sustainable Energy regarding the Draft First Triennial Investment Plan for the Electric Program Investment Charge Program

The California Center for Sustainable Energy (CCSE) thanks the California Energy Commission (Energy Commission) for the opportunity to provide these public comments regarding the draft first triennial investment plan for the Electric Program Investment Charge (EPIC) Program. CCSE strongly supports the proposed investment plan and appreciates the great effort and thoughtfulness of CEC and CPUC staff in creating this draft.

As we have stated in our previous comments in this docket, investment in Applied Research, Technology Demonstration and Deployment, and Market Facilitation is critical to ensuring the widespread deployment of next generation, clean energy technologies that provide ratepayer benefits and aid in meeting our state's clean energy goals. We also agree that continued funding for the New Solar Homes Program (NSHP) should be a priority if enabled by additional legislation. We do have minor comments with regard to general prioritization or scoring of the strategic objectives, as well some comments directed to particular objectives or items.

CCSE offers the following recommendations to the Energy Commission for revisions to the draft first triennial investment plan for EPIC Program funds administered by the Energy Commission:

- I. **Prioritization of efforts that support existing programs**
Like many of the stakeholders in this process, CCSE has been engaged in policies and programs aimed at transforming the state's clean energy marketplace for over a decade now. This work spans a continuum of technology adoption, from research and demonstration work to market support and facilitation activities including programs such as the California Solar Initiative (CSI), Self-Generation Incentive Program (SGIP), and Clean Vehicle Rebate Program (CVRP), as well as a number of market development and facilitation programs, including the Department of Energy (DOE) Better Buildings Program, DOE SunShot Rooftop Challenge Program, and most recently,

statewide Marketing, Education, and Outreach (ME&O) for Energy Upgrade California (EUC). The EPIC Investment Plan presents an excellent opportunity to tie the successes and lessons learned from these programs together through website development, databases, training, regulatory streamlining and other activities described in the plan. As such, CCSE recommends that emphasis be given to efforts that support this integration through preferential scoring or other means. For example, the California Solar Statistics (CSS) database and web interface has been an invaluable tool for the solar industry, researchers and consumers alike. However, it is currently only available for solar systems installed through the investor-owned utility CSI program, and it does not include ERP, NSHP, or any of the municipal utility program data. Furthermore, there is much work to be done to ensure that this information continues to be maintained and available once the CSI program closes, which is imminent in the Residential sector. In addition, this model of data collection and presentation should be replicated for energy efficiency and building retrofit measures, demand response and storage facilities, and electric vehicle and charging infrastructure deployment. This is not to suggest that wholly new or innovative research, deployment and demonstration should not be encouraged, but we must be sure that we consolidate and make sustainable the efforts we have already begun in creating the clean energy economy of the future.

II. S2.1 Proposed Funding Initiative: Develop Cost-Effective Metering and Telemetry to Allow Customers with Demand Response, Distributed Generation, Plug-in Electric Vehicles, and Energy Storage to Participate in California ISO Markets

CCSE recommends that this Strategic Objective be expanded to include an effort to standardize the communications protocols for EVs and EVSE, perhaps by working with SAE or other standards bodies.

III. S15.1 Proposed Funding Initiative: Develop a Standardized Methodology to Access Job Creation and Net Jobs *and* S15.2 Proposed Funding Initiative: Provide Grants for the Development or Enhancement of Training and/or Apprenticeship Programs to Support Clean Energy Deployment Programs in IOU Service Territories

Investments at the local level are critical to building the infrastructure for deployment of new energy technologies. As referenced in S15.1 and S15.2 of the EPIC Investment Plan, CCSE sees immense opportunity to train and educate a clean energy workforce that will facilitate employment opportunities and training programs in the clean energy sector, helping companies reduce their human resource expenses while creating job opportunities for at-risk communities. The cleantech industry requires skilled and specialized workers that the market cannot yet provide. A statewide Clean Energy Workforce Needs Assessment would illuminate the workforce needs, demands, and opportunities of the region.

CCSE is already in the process of looking for funding and building partnerships with economic development and government organizations in the Los Angeles area to create a Clean Energy Workforce Needs Assessment. Furthermore, the Needs Assessment will dictate programming at a workforce training Center at the La Kretz Innovation Campus. The La Kretz Innovation Campus is a 60,000 square foot facility in downtown Los Angeles that includes office space, a cleantech prototyping workshop, R&D labs, conference facilities, a community park, and workforce

training facilities. EPIC funding has an opportunity to fund a program that has already been building momentum in the region and use it as a model to create workforce centers statewide.

We appreciate the opportunity to provide these comments to the Energy Commission, and we look forward to further coordination with the Energy Commission and IOUs in the coming months in the development of their first triennial investment plans.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sachu Constantine', with a stylized flourish at the end.

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