



March 3, 2015

Commissioner Andrew McAllister
California Energy Commission
1516 9th Street
Sacramento CA 95814

EPIC Implementation Workshop

Dear Commissioner McAllister,

We are writing you in strong support of research centers such as the Western Cooling Efficiency Center (WCEC) at UC Davis, an applied research, development, and demonstrations partnership founded in large part based on CEC funding. The WCEC grew out of a close collaboration between the HVAC industry (companies large and small), California's investor-owned utilities, and the California Energy Commission, to encompass a broad research, demonstration, education and training portfolio.

As a labor organization that represents sheet metal workers in California, Arizona, Nevada and Hawaii the Western States Council is extremely interested in the research, outreach, and training efforts the WCEC conducts on a range of HVAC efficiency projects and the work it has done demonstrating the importance of quality installation and maintenance of HVAC systems. For example, both SCE has funded a line of research investigating and demonstrating the importance of quality installations and maintenance for HVAC efficiencies that our members have participating in. The impartial data and conclusions reached in this research will help inform IOU programs, and drive greater efficiencies from HVAC systems across the state. These projects originated in the programmatic funding provided by the CEC under the WCEC's interagency agreement, which provided the long-term, institutional support that gave the WCEC the breathing space to create its HVAC Behavioral Research Initiative. That type of funding is not possible within the normal, competitive solicitations process, but the WCEC's ability to create this capability has benefitted the state and its ratepayers many times over; moreover, the IOUs themselves saw its value, and brought this type of research into their own portfolios, multiplying the effect of the rather modest seed funding contributed by the CEC via the interagency agreement. Additionally, our members, as well as the state as a whole, has benefitted from the WCEC's outreach, training, and education efforts to inform users about developments in HVAC research and demonstrations as well as the information they've made available to a range of HVAC industry participants on technology development and codes and standards. Again, both the Quality Installation/Quality Maintenance projects as well as its outreach and education programs started as rather modest programs, seed-funded by the CEC through multi-year investments in the WCEC's mission, and later grew to funding by other organizations. They are superb examples of how state programmatic funding of research centers can give organizations

like the WCEC the ability to invest for the long term, and then serve to spark investment elsewhere in the market.

The WCEC is very effective in addressing and resolving building conditioning-related inefficiencies that, if left unaddressed, will prevent the state from meeting its ambitious energy efficiency goals. A significant part of the WCEC's success has been due to its ability to quickly bring resources to bear on a challenge, and then either abandon it if a solution proves to be ineffective, or (more often) continue to pursue that solution with CEC funding or transition project support to other sponsors, such as is described above. This type of agility is not built into the existing competitive solicitations process; indeed, the existing system inhibits that type of flexibility. Under long-term, programmatic state support, the WCEC can frequently conceptualize a challenge and launch investigatory work and research long before the challenge can even be captured in and advertised in program opportunity notices. A second example of WCEC success under center support from the CEC include its aerosol envelope sealing technology, which has since gathered both private and federal research support and is now nearing market introduction. We strongly believe that the nimbleness associated with funding research centers or programs (rather than only specific projects) are essential to achieving California's efficiency targets in a timely and cost-effective manner.

Investing in the WCEC and similar research centers with flexible, multi-year funds presents the opportunity to effectively integrate and address long-term energy efficiency issues, as well as the training, education, and outreach necessary to capture those lessons for users. The Western States Council strongly encourages the CEC to fund the research centers best postured to deliver these results.

Sincerely,



Erik S. Emblem
Executive Director
Western States Council
Sheet Metal, Air, Rail and Transportation Workers