

July 31, 2015

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Protecting Marin Since 1934

Dear Dawn:

Thank you for the opportunity to comment on Marin Clean Energy's Draft 2016 Energy Efficiency Program Implementation Plans.

The Marin Conservation League, in its ongoing efforts to preserve, protect and enhance Marin's natural assets, has supported MCE's mission since its inception "to address climate change by reducing energy-related GHG emissions through the use of renewable energy and energy efficiency." MCL endorses MCE's Draft 2016 EE Program Implementation Plans, which set appropriate goals, and the implementation measures proposed seem generally reasonable. We offer some specific comments and some suggestions for additional sector-specific implementation.

General

Time constraints don't allow for comments on every sector. Therefore we will follow up here on our letter of July 9, 2015, which includes both dairy-specific and more widely applicable suggestions.

In several sectors there are existing groups which should be contacted and which might provide good points of entry for engaging potential customers or groups of customers.

Specific to dairies

We believe that collaboration, such as with Sonoma Clean Power, can result in economies of scale among dairies and their processors to improve energy and water efficiency, develop renewable energy and institute carbon farming. This is a core objective of the North Bay Dairy Energy Alliance now under development, which can be a key partner in MCE's EE program.

Dairies can be a part of the climate solution in three main ways:

1. **Energy Efficiency.** Identifying and implementing cost effective energy efficiency opportunities can reduce GHG emissions associated with electricity and gas use, while saving on dairy operating costs. Currently information on North Bay dairies' energy use and energy saving opportunities is limited. Service providers in this field feel that the majority of dairies in the North Bay have good potential for energy efficiency, especially with lighting and refrigeration. Comprehensive audits of energy and water will help develop incentives that provide benefits to MCE and all its customers. Incentives tailored to these local efficiency opportunities can help provide least cost means to meet local energy demands and reduce GHG emissions.

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2. Renewable Energy. Comprehensive energy efficiency audits can also gather logistics and other data at the dairies to provide technical and economic feasibility and cost benefit analyses to help scale up methane digesters, and other forms of renewable energy.

3. Carbon Farming. Carbon farming for carbon sequestration in pastureland in the North Bay is showing great potential already through efforts by the Carbon Cycle Institute. Research indicates that the byproducts of methane digestion are more crop available and could be quite complementary with carbon farming. The comprehensive audits can also gather logistics and other data at the dairies to provide feasibility and cost benefit analyses to support carbon farming as a regional measure for reducing GHGs.

Commercial Sector

Some of the new strategies proposed for the commercial sector, such as integrated demand side management, are relatively unproven, yet represent an exciting opportunity for the communities that MCE serves to demonstrate leadership and serve as pioneers forging new approaches to energy efficiency.

For example, web-based tools and software would be most cost effective when used by aggregated groups of customers within sectors with similar buildings/equipment and energy saving opportunities. Over recent years web-based energy efficiency tools designed for utility company one-on-one interaction with individual customers have often not yielded substantial energy savings. However, collaborative and common interest group action has a long history of success in human culture and is consistent with previous recommendations of MCL's Climate Action Working Group and endorsed by Sustainable Marin. Sharing case histories, success stories, reducing concern and risks among peers, developing standardized solutions within sectors, organizing projects including group purchases - all can increase participation and savings.

The Single Point of Contact (SPOC) can also serve customers more effectively as A) specialists within customer sectors with similar demand side management opportunities; B) sources of site-specific technical support; and C) support with sector-specific web information. The single point of contact may need to have technical expertise for certain sectors such as wineries, dairies, etc. (commercial and industrial) and hence technical assistance could be merged cost effectively with SPOC.

We suggest collaborating with existing community based groups such as Chambers of Commerce and other business groups, since person-to-person contact among peers is a strong means of motivating members of the business community to take the necessary initiatives. Decision makers need both knowledge and confidence concerning the value of EE programs before they are likely to act.

Multifamily

The aggregation of customers within the multifamily sector and much of the commercial

sector may need to begin with property owners/landlords who own the equipment as well as the buildings. Hence their cooperation and engagement is essential. Local organizations that represent landlords, such as the Marin Income Property Owners Association, may be a good place to start.

In an era of social media and online review resources such as Yelp, tenants often share information, particularly regarding subpar multifamily buildings. Rental customers are among the most underserved by prior energy efficiency programs. However, the concept of “organizing tenants” is undesirable to landlords for obvious reasons. This and the split incentive issue (where the landlord owns the building and much equipment in the rental unit, but does not have incentive to make it more efficient because the tenant pays the utility bill) will require developing strong positive results for landlords and innovative approaches in order to benefit MCE’s rental customers.

One potential approach is the Pay As You Save (PAYS) financing and implementation program that has been successfully piloted in multifamily buildings in Sonoma County and elsewhere in the U.S. The Sonoma County pilot was conducted by the local water agency and included both water and energy saving measures. The PAYS program pays up-front costs of energy and water efficiency improvements and provides on-bill-repayment over time, while also removing other barriers to implementation.

More thorough integration of energy, water and wastewater efficiencies can leverage all resources as well as the potential for funding support from CPUC, California Department of Water, California Energy Commission, State Water Resources Control Board, USDA and related agencies.

Efforts should be focused on reaching and educating multi-family building owners and also renters, and on making energy efficiency changes as simple, reliable and cost-effective as possible.

Single Family

MCL notes that MCE offers a fine array of services to the single family sector, yet its PIP mentions little concerning how it intends to actually make contact with single family homeowners. In addition to the door-to-door program described, we suggest that MCE work with and support existing community-based groups such as Resilient Neighborhoods, Main Street Moms and Strategic Energy Innovations, which already have roots in neighborhoods. Practical experience shows that neighbor-to-neighbor interactions are an effective way of motivating residents to act and to actually take advantage of the many programs offered. Working with groups of neighbors with similar interests and needs can make delivery of EE programs more efficient.

MCE should consider a grant program to encourage, train and fund community-based groups to develop and implement house to house programs, especially in locations where no existing groups are presently working. This plan has been used successfully by the US Environmental

Protection Agency, among others. Such grant programs could further MCE's mission not only through measurable efficiencies but also by helping build strong community support.

Thank you for your consideration.



Kate Powers, President

cc: Supervisor Damon Connolly
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Beckie Menten, Marin Clean Energy