

R.06-04-010

**Comments of the California Center for Sustainable Energy on Preliminary  
Energy Efficiency Strategic Plan**

**California Center for Sustainable Energy**

**March 24, 2008**

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The California Center for Sustainable Energy (CCSE) appreciates the opportunity to present comments to San Diego Gas and Electric, Pacific Gas and Electric, Southern California Edison and Southern California Gas (Joint Utilities) on their *California Energy Efficiency Strategic Plan Supplemented Draft (Draft)*. In addition to contributing to the final California Energy Efficiency Strategic Plan (Plan), CCSE requests these comments be considered for potential impact on the 2009-2011 EE portfolio applications as well.

The California Center for Sustainable Energy has participated wholeheartedly in the strategic planning process sponsored by the California Public Utilities Commission (Commission) and Joint Utilities, presenting our ideas and experience during planning workshops, and in written form through our chairmanship of the Residential Market Transformation, Education and Outreach subcommittee. We reiterate here that to be successful, the California Energy Efficiency Strategic Plan (Plan) and implementation process must continue to be truly inclusive, integrated and transparent with regard to technologies, stakeholder input, and marketing education and outreach (ME&O) efforts.

At every strategic planning workshop, numerous parties expressed that to be successful, the EE proceeding and related actions must remain inclusive and transparent. CCSE supports the efforts that have been made by the Joint Utilities, Commission and Conveners to date to ensure that a collaborative, multi-party approach is used in the Plan and implementation process. For this reason, CCSE strongly advocates a process that supports multiple stakeholders' input in an ongoing fashion.

The California Energy Efficiency Alliance (CEEA)<sup>1</sup> is an example of how the expertise of not only the IOUs but also other EE experts in California can play ongoing roles in the long-term plans for transformation of the EE market. The input of implementers and industry specialists is unique and diverse; inclusion of their recommendations and insight into the Plan and implementation process will aid in ensuring that all dimensions of EE have been fully explored and incorporated into each successive iteration, earlier rather than later.

Throughout the Draft, the concept of leveraging experience with current successful EE practices and programs is repeated. Recommendations like that of including the current low-energy homes in Roseville as a guide<sup>2</sup> in reaching ZNE homes will save ratepayer dollars and build on successful programs without “reinventing the wheel.” Other examples like soliciting advice from and building on the successful track record of the American Council for an Energy Efficient Economy (ACEEE) are encouraged. Through their ongoing dialogues, IOUs and other stakeholders can contribute to the success of EE’s market transformation with these types of open collaboration.

Many integration efforts can facilitate the successful implementation of the EE portfolios of programs, through EE technologies, and education, marketing and outreach efforts. Senate Bill 1 mandates the integration of EE and solar technologies in the administration of the California Solar Initiative. One of the primary visions of the EE proceeding (and indeed all CPUC proceedings) is that the reduction of individuals’ carbon footprints will require true integration. In the case of San Diego, SDG&E has several partnership programs with leading municipalities and third party implementers, to the great advantage of San Diego’s energy consumers; the whole is truly greater than the sum of the parts. CCSE appreciates the opportunity to be one of SDG&E’s many partners, and believes that the continuation of these types of cross-cutting, integrated programs should be continued in the short-, mid- and long-term Plans.

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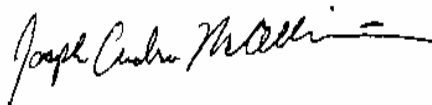
<sup>1</sup> Joint Utilities California Energy Efficiency Strategic Plan Supplemental Draft, p. 122

<sup>2</sup> Joint Utilities California Energy Efficiency Strategic Plan Supplemental Draft, p. 11

CCSE also encourages the Joint Utilities to be specific in stating for which tasks they anticipate third party participation. For example, in Figure 1.1: Structure of Strategic Planning Relationships, many stakeholders are named as such, but third parties are not included. Throughout the Plan, (as is done within the "Summary Tables") it should be clear that parties with EE experience and expertise, namely EE program implementers, energy nonprofits and technology experts be listed as stakeholders as well as the end users, government and regulators. Third party participation in the strategic planning workshops contributed to many of the ideas included in the Draft, and were welcomed by the Commission as a valuable contribution to the process. This input should continue to be valued by including third parties within the text of the Plan.

We appreciate the opportunity to be a contributor to the Plan's process, and look forward to a long-term productive relationship with the Joint Utilities and the Commission on the EE proceeding.

Sincerely,



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