



409 East Main Street, Suite 200  
Richmond, VA 23219

Ms. Karen Sabasteanski  
1111 East Main Street, Suite 1400  
Richmond, Virginia 23219

April 9, 2018

Dear Ms. Sabasteanski,

I am writing today on behalf of the Virginia Energy Efficiency Council (VAEEC) to provide comments on the Commonwealth's Carbon Trading Rule. Energy efficiency is one of the most practical, cost-effective tools to reduce our energy consumption and dependency on fossil fuels, which in turn, helps reduce carbon emissions. Therefore, we applaud the inclusion of the five percent carve out for energy efficiency programs in the Carbon Trading Rule.

The VAEEC is a 501c3 organization, headquartered in Richmond, that provides a platform for stakeholder engagement while assessing and supporting programs, innovation and policies that advance energy efficiency in Virginia. We work on engaging stakeholders to identify barriers and opportunities to energy efficiency as a resource in Virginia, and on developing a strong, fact-based and balanced industry voice before local, state and national policymakers and regulators. Our diverse group of 90+ members include Fortune 500 companies, nonprofits, local governments, state agencies, utilities and individuals. The VAEEC's goal is to make sure energy efficiency is recognized as an integral part of Virginia's economy and clean energy future.

The VAEEC is currently focused on several program areas which reflect our role in advancing innovative and effective strategies in the energy efficiency field: launching Commercial Property Assessed Clean Energy, or C-PACE, financing; advocating for rigorous energy codes in the Virginia Uniform Statewide Building Code; expanding utility energy efficiency programs, and; supporting benchmarking and data access initiatives. Expanding energy efficiency provides Virginia residents with affordable energy bills and healthier, more comfortable homes.

Last year, the American Council for an Energy-Efficient Economy (ACEEE) listed Virginia as one of the "Most Improved" states in their 2017 State Energy Efficiency Scorecard. Moving from 33<sup>rd</sup> place to 29<sup>th</sup> place underscores the work VAEEC, our members and our partners have done to advance smart energy efficiency policies and initiatives. But there is even more that can be done to help Virginia break into the top 25.

The recent passage of the Grid Transformation and Security Act of 2018 paves the way for greater opportunities as well. This legislation provides tremendous opportunities for energy-saving programs that will be provided to Virginians over the next decade, including a combined commitment by the electric utilities to spend over \$1.3 billion on energy efficiency programs.

These new programs, in addition to the energy efficiency carve out of the Carbon Trading Rule will propel Virginia, under Governor Northam's leadership, into the spotlight as a leader on energy efficiency.

Sincerely,

A handwritten signature in black ink that reads 'Chelsea Harnish'.

Chelsea Harnish  
Executive Director