

VAEEC Energy Plan Comments Draft Outline

According to DMME, there will be four focus areas on energy efficiency in the Virginia Energy Plan:

1. Achieving the 10% voluntary savings target
2. Lead-by-example strategies for state and local governments
3. Financing
4. Program design for DMME programs

VAEEC is recommending the following ideas for the four focus areas:

1. Achieving the 10% voluntary savings target
 - a. Continue developing tools to track success
 - i. Analyze other programs not currently included in tracking
 1. local government public building benchmarking and EPCs
 2. local government EE programs and commercial benchmarking
 3. industrial programs
 4. transportation
 - ii. Baseline was determined using transportation and industrial consumption numbers but no industrial or transportation programs are being tracked
 - b. Continue Data Access Stakeholder group
 - i. Support mandatory benchmarking legislation
 - ii. Identify solutions to technical issues brought up during last year's stakeholder meetings
 - c. SB 966
 - i. Policy statement on importance of diversifying EE programs both in terms of customers (low-income, market rate residential, commercial) and program type (i.e. financial incentives and behavioral programs)
 - ii. Policy statement on importance of customer data access as it relates to smart meter deployment, which includes easily understandable data analysis
 - iii. Cost-benefit tests
 1. Recommend reviewing at portfolio level instead of at measure or program level
 2. Consider non-energy benefits, particularly as they relate to economic development
 3. Review National Standard Practice Manual (NSPM) and consider different inputs for tests
 - iv. Active participation in SCC stakeholder group
 - v. Look at overall portfolio to ensure that utilities are on track to spend EE commitments (\$1.2B)
 - vi. Active participation in IRP planning
 1. How is potential measured?

- 2. how often?
 - 3. transparent process
- d. Building Codes
 - i. DMME should actively participate in the Department of Housing and Community Development (DHCD) code update process to provide information on EE benefits
 - ii. DMME should collaborate with DHCD staff on energy working group
 - iii. Model energy savings from new code updates and include in 10% savings target
 - iv. DMME should work with DHCD and SCC Energy Sense to provide education materials on new home construction/ building codes
- e. Commercial Property Assessed Clean Energy (C-PACE) Financing
 - i. Continue working with the Mid-Atlantic PACE Alliance (MAPA) partners and C-PACE stakeholders to:
 - 1. launch C-PACE programs in localities across Virginia
 - 2. Increase deal flow within the Mid-Atlantic region
 - ii. Promote the MAPA Regional Toolkit
 - iii. Play a supporting role to host a clean energy conference in 2019
- 2. Lead-by-example strategies for state and local governments
 - a. Benchmarking
 - i. DMME should track energy usage at all state-owned buildings
 - ii. permanently adopt pilot program
 - iii. include localities on voluntary basis- help them benchmark public and/or commercial buildings
 - b. ESPC
 - i. DMME should actively promote new EPC framework to localities
 - ii. Overcome financial barriers for localities
 - iii. Good way to meet public savings targets
 - iv. low data collection (only required energy savings reporting for first few years) more ongoing energy savings data reporting throughout project
 - v. important because make it easier for agencies with limited capital to make EE improvements- one way to make sure agencies have incentives (DMME does have some: Clean Energy Development and Services-loans (continue this loan program)
 - vi. set up revolving loan fund for public buildings like they have for Commonwealth Energy Fund for commercial buildings.
 - vii. tracking deferred maintenance data would help tell story of EPC effectiveness
 - c. Public building requirement (15%)
 - i. Issue Executive Order to continue energy management program, which ended last year
 - ii. set clear process for reporting deadlines and progress towards meeting target (through benchmarking)
- 3. Financing
 - a. C-PACE

- i. Continue to support MAPA efforts to provide outreach and education to C-PACE stakeholders to:
 - 1. launch C-PACE programs in localities across Virginia
 - 2. Increase deal flow within the Mid-Atlantic region
 - ii. Promote the MAPA Regional Toolkit
 - iii. Play a supporting role to host a clean energy conference in 2019
 - b. Carbon Rule
- 4. Program design for DMME programs
 - a. Carbon Rule
 - b. EE Registry
 - i. Transparent
 - ii. Include all state buildings and institutions of public higher education