

July 23, 2018

Jonathan Raab
Facilitator, California Energy Efficiency Coordinating Committee
118 South Street, Suite 3A
Boston, MA 02111
raab@raabassociates.org

Subject: CAEECC Membership Application

Dear Mr. Raab,

I respectfully submit this CAEECC membership application for your consideration. I will represent CodeCycle LLC at CAEECC.

Alternate representative: Tom Garcia (building department liaison for CodeCycle)

About CodeCycle. CodeCycle is a third-party implementer developing automated systems to help California's building departments with the challenging task of Title 24 enforcement. CodeCycle is running in four cities, both through BayREN's Codes & Standards program and a CalSEED demonstration project in the Central Valley. Two additional cities will be working with CodeCycle starting early August.

Relevance to CAEECC. With Title 24 and related building inspections playing a central role in a wide range of efficiency programs, CodeCycle's understanding of compliance processes should be of significant value to the CAEECC membership. CodeCycle's ongoing engagement with California's design and construction industry provides our team with significant insights on standard building practices and the challenges for building departments in implementing the State's efficiency policies. CodeCycle is also helping develop policies and pathways to bring measured energy savings to portions of the portfolio that have traditionally been non-resource. CodeCycle's advocacy on that front was recognized in Decision 18-05-041.

With the CPUC placing third-party providers in a central role for the EE portfolio going forward, it would appear that such third-party implementers are underrepresented within the CAEECC membership. This is particularly true for the smaller implementers that are likely to drive the most significant innovations within the EE market.

CodeCycle Understands and Supports the CPUC Cost Effectiveness Framework. IOU ratepayer dollars are invested in energy efficiency programs both to benefit the environment and to benefit ratepayers themselves, by delivering energy savings at a lower cost per kWh, kW, or therm than if such energy were provided by the grid. To ensure that such energy efficiency investments are cost-effective for ratepayers, the IOUs must manage a portfolio of efficiency programs that has an overall cost-effectiveness of 1.0 (excluding code advocacy costs and benefits). The 1.0 benchmark must be met using both the Program Administrator Cost (PAC) test and the more stringent Total Resource Cost (TRC) test (which includes the additional costs incurred by program participants in installing efficiency measures). The valuation of each kWh or therm saved is presently determined by E3 via their Avoided Cost Calculator (ACC). The PAC and TRC tests are generally implemented for purposes of PA and CPUC analysis via the Cost Effectiveness Tool (successor to the "E3 Calculator"). We are in ongoing discussions with ED staff and PA staff to apply these protocols to CodeCycle's efficiency work.

At the same time, the CPUC and other state energy agencies have been directed to increase participation in EE programs in the State's disadvantaged communities. CodeCycle believes that with the right types of innovation and program delivery models, California's disadvantaged communities can be better served while still hitting the State's cost effectiveness targets.

Commitment to CAEECC Process. I have personally attended the majority of CAEECC meetings over the last two and a half years, including many ad-hoc meetings and subcommittee meetings. CodeCycle has also been actively involved in the CPUC Energy Efficiency Proceedings R13-11-005 and A17-01-013, and we regularly attend policy discussions hosted by the California Energy Commission. Much of our participation in these forums relates directly to advocating for improved metrics for Codes and Standards compliance improvement, moving the field to one based on data-driven solutions. I have reviewed the CAEECC roles, responsibilities, and ground rules, and I believe CodeCycle can fully adhere to the CAEECC procedures.

Qualifications

Dan Suyeyasu, Director of CodeCycle. I lead both policy and engineering efforts within CodeCycle, driving critical market transformations in the realm of Codes and Standards. Prior to CodeCycle:

- I led the IOU funded research project "The Technical Feasibility of Zero Net Energy Buildings in California".
- I assisted with CEC Title 24 research and development efforts. My Title 24 work included management of E3 in the development of TDV (analogous to ACC) and establishing updates to the CEC's cost-effectiveness protocols for the adoption of new Title 24 measures.
- I worked for seven years with Environmental Defense Fund (EDF), advocating for the use of tailored market mechanisms to solve environmental problems.

Tom Garcia, Co-Founder of CodeCycle. Tom works closely with building departments and design professionals as they implement CodeCycle's compliance methodologies. Prior to joining CodeCycle, Tom had 30 years of experience as a municipal code official in the City of Fairfield. Tom has also:

- Served as chair of the California Building Officials (CALBO) Energy Commission Advisory Committee from 2007 to 2014.
- Collaborated with the IOUs during the development of the 2008 and 2013 standards.
- Represented CALBO in two positions with the Western HVAC Performance Alliance (WHPA).

We look forward to more fully participating in the CAEECC process. Let me know if you have any additional questions regarding this application.

Sincerely,



Dan Suyeyasu
Director, CodeCycle LLC

phone: 510-410-2457

email: dan.suyeyasu@codecycle.com

cc: Erin Brooks, SoCalGas
Lara Ettenson, NRDC