

East Bay Community Energy

I would like to thank the East Bay Community Energy for the opportunity to comment on the draft chapters of the Local Development Business Plan. I appreciate the amount of thought and work that has gone into developing the plan so far. Some of my concerns may stem from the incomplete nature of the plan at this date.

One of my main concerns is that the draft chapters, other than the “EBCE Workforce Development: Strategy and Policy Guidance”, do not adequately reference the goals and purposes listed in the Joint Power Agreement for the establishment of EBCE.

An example of this is the target in the Feed-in Tariff Design Recommendations of only 1.29% of load being met by the FIT program procurement after 3 years. This does not seem compatible with the stated greenhouse gas reduction goals of the members of the JPA.

Among the goals of the JPA is an energy portfolio that incorporates energy efficiency and demand response programs and has aggressive reduced consumption goals. In my opinion, these are goals have not yet been adequately addressed.

I suggest the draft chapters be carefully evaluated to in light of the goals and purposes of the JPA.

The CalEnviroScreen tool provided by the state Office of Environmental Health Hazard Assessment (<https://oehha.ca.gov/calenviroscreen>) can be used to evaluate how well the projects support low-income households and promote public health in areas impacted by energy production.

Demand response and energy storage projects are particularly important given that state wide wholesale electricity prices are sometimes going negative now due to oversupply conditions. <http://www.latimes.com/projects/la-fi-electricity-solar/> It would be prudent for EBCE to support these projects more.

Sincerely,
Jim Lutz