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**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

*Order Instituting Rulemaking to  
Investigate and Design Clean Energy  
Financing Options for Electricity and  
Natural Gas Customers.*

Rulemaking 20-08-022

**COMMENTS IN RESPONSE TO THE SUBJECT RULEMAKING OF  
ENOVITY, INC.**

October 2, 2020

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**I. Introduction**

Enovity, Inc. (“Enovity”) respectfully offers its comments in response to the subject Rulemaking.

**II. Interest in this Proceeding**

Enovity is a developer and implementer of energy projects and energy efficiency programs. We have a substantial stake in promoting public policy that drives cost-effective energy solutions for our ratepayer customers and our regulated utility clients.

Enovity has been implementing energy efficiency programs in California for over 16 years, focusing on innovative programs and developing designs that drive cost-effective penetration of efficiency into untapped markets. During that time, Enovity has been an active implementer of projects using and promoting low-cost financing mechanisms through various sources. We see and are excited about a broader opportunity for low-cost financing to drive more strategic investment in distributed energy resources (DERs) that go well beyond energy efficiency and look forward to participating as a Party to this proceeding.

**III. Commentary in response to the Rulemaking**

Energy efficiency, demand response, building decarbonization, distributed solar and other self-generation technologies, and energy storage are resources that will be increasingly called upon, collectively, as a vehicle for utility customers to provide cost-effective grid benefits. While the various assistance mechanisms up to now have been substantial, they have, in most cases, exclusively focused on specific resource types.

We, too, see a need and opportunity to provide assistance mechanisms, such as

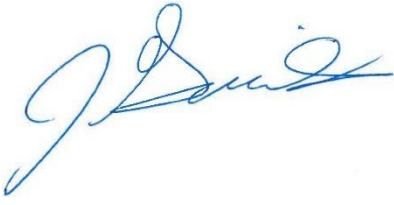
financing, that transcend the siloed aspects of traditionally implemented programs to drive more cost-effective and integrated customer solutions. As acknowledged in the Ruling, “the Commission has thus far lacked a cohesive and comprehensive strategy for helping customers finance energy improvements to their homes and buildings.” We suspect this lacking is primarily due to the disparate nature of the funding sources and cost-effectiveness testing methods for the various resource types covered under their distinct proceedings. We see an opportunity for this proceeding to increase the uptake and investment in customer-owned DERs and drive parity (or at the very least to acknowledge a disparity) in determining cost-effectiveness across resource types. Removing double-standards in measuring cost-effectiveness across DERs is paramount for the commission to develop a cohesive and comprehensive investment strategy specific to this proceeding, if nothing else, as it relates to financing broader "energy improvements" to customers' homes and buildings.

#### **IV. Conclusion**

We couldn't agree more with the Commission "that customers do not approach investments in the same resource-specific manner that the Commission uses to make funding decisions.” Beyond the investigation and design of mechanisms to help finance DERs for utility customers, we envision this proceeding as an overall opportunity to achieve strategic and cost-effective benefits to the grid, statewide energy goals, and reduction in the overall cost of service to customer ratepayers.

Dated: October 2, 2020

Respectfully submitted,

/s/ 

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