



January 8, 2013

Via electronic mail: abenjamin@dccouncil.us

**Comments of Northeast Energy Efficiency Partnerships (NEEP)
Regarding Omnibus Energy Bill B20-573**

Ms. Aukima Benjamin
Committee on Transportation and the Environment
Council of the District of Columbia
1350 Pennsylvania Ave, N.W.
Washington, D.C. 20004

Dear Ms. Benjamin,

On behalf of Northeast Energy Efficiency Partnerships (NEEP), thank you for the opportunity to submit comments regarding the Sustainable D.C. Omnibus Energy Act of 2013, B20-573.¹

NEEP is a regional non-profit organization that works to accelerate energy efficiency across the Northeast and Mid-Atlantic states. Through advocacy, collaboration and education we focus on three areas where we believe energy efficiency can have the greatest impact: buildings, high efficiency products and best practices. Our unique approach helps bring together all stakeholders to accelerate energy efficiency and highlight its impacts on the region, the economy and the planet.

First off, I would commend the District and the Sustainable Energy Utility for making steady progress on its energy efficiency goals, as set forth under the Clean and Affordable Energy [Act](#) of 2008. While we support Mayor Gray's leadership on sustainability issues overall, our comments will focus primarily on Title I of the Act.

Let me say briefly that we support Subtitles A and B in the bill, relative to building benchmarking data. The District is among a handful of leading cities in the nation that requires large building owners to disclose their energy use. Making building energy consumption accessible and transparent – while ensuring that privacy concerns are met – is key to allowing the market to value and expect more efficient buildings during real estate transactions. Well-considered protocols for how electric and gas utility data is collected and shared in a way that minimizes burden for property owners can help the District advance this important policy.

The second issue I would like to address is Title I, Subtitle C: "Improving Energy Efficiency through Comprehensive Energy Planning." In NEEP's view, this proposal, while well-intentioned, would undermine a foundational best practice for energy efficiency program planning and administration, namely: the use of a permanent stakeholder advisory board to guide energy efficiency program and policy decisions.

Many of the leading states in the nation have established stakeholder boards that bring together environmental, consumer and low-income advocates, efficiency experts, business voices, utilities

¹ These comments are offered by NEEP staff and do not necessarily represent the view of NEEP's Board of Directors, sponsors or underwriters.

and/or other energy efficiency program administrators, etc. Among states in the Northeast that employ such boards are [Maine](#), [Massachusetts](#), [Rhode Island](#), [Connecticut](#) and [New Hampshire](#). New York is another state that is working to reformat its energy efficiency advisory group process. These boards work because they bring everyone to the table to craft program goals and delivery mechanisms, and then get support to ensure successful implementation of broader public policy objectives.

In the District, the SEU Advisory board similarly includes representatives from a diverse array of groups and perspectives. To do away with the SEU Advisory Board would, in NEEP's view, be a step in the wrong direction. While seeking ways to increase opportunities for public engagement, streamline Board activities and interaction with the District Department of the Environment and the SEU are worthwhile objectives, we believe that these improvements could be made administratively. We therefore urge the Council to strike Title I, Subsection C from Bill 20-273.

Thank you very much for considering NEEP's input in this important legislation. Our staff is available at any time to talk about energy policy and programmatic issues in the District and beyond.

Sincerely,



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