

Anindita Mitra, Representing the American Planning Association, Washington Chapter

- Continuous Monitoring/Disclosure of Bldg Performance

This seems to be a useful program as long as both existing and new buildings were required to participate. Also, the program works only if industry benchmark(s) are established for each building type. It would be important to report these benchmarks to influence overall building performance. If these benchmarks were not static, but somehow an aggregate average of overall industry performance, it could provide industry incentive to continuously improve and lower their energy use (in design and use). For instance, with every new efficient building, we would be actually lowering the building type benchmark, thereby increasing the threshold for all existing and new buildings to lower their performance. Hopefully this continuous monitoring/disclosure implies a more manageable schedule such as an annual or seasonal report versus monthly or daily reporting.

- District Energy/Waste Heat

This could be an excellent program if indeed there are many opportunities to recapture waste heat, set up district heating systems etc. Intuitively it seems that opportunities could be greater within existing large campuses such as hospitals, colleges and universities. The challenge could be that traditional energy and hot water systems in these areas could be well developed, making establishing a new system including underground pipes etc fairly economically infeasible. It starts to make sense if the hot water is recycled and tied to other new infrastructure systems such as small waste water treatment plants, new local generation plants etc. With the price of land, these new infrastructure systems could be further infeasible unless somehow tied into some other public projects such as parking garages, stadiums, libraries, fire stations etc. If we are to use this technology to offset the projected increase in energy use in the city, these new systems will have to be strategically located to make them financially feasible in a few decades – when hydro electricity could become more pricey or rare..

- Occupant Behavior/Plug Load

This could have significant potential to affect behavior, particularly for retail, institutional and residential uses. While the residential program may not be very successful in changing behavior, basically due to lack of information, if calculated on a per square foot basis for the other uses, it could significantly incent new management, operation and administrative policies. This program would indeed reward good behavior and influence bad behavior to change. This should be easy to implement and if advertised well could significantly impact energy demand (a good example is Santa Barbara's experience with prolonged drought and using pricing to affect use of potable water)

- Voluntary v. Mandatory Approaches

In this real estate market it appears that any approach should be voluntary for a set number of years with a mandatory start in say 2 years or 5 years? This gives enough time for everybody to get used to the new ways of doing business but eventually evens out the playing field for all -- such that champions and innovators are not excessively penalized and can come back to do more innovative work.

- Prioritizing Incentive Dollars: Existing v. New Construction

It seems that incenting new development is less productive when compared to incenting the retrofit and greater efficiency of existing buildings. Also, providing incentives such as low-interest loans to all new development seems to be reasonable. However, grants and other payouts should be offered only to affordable housing projects. In the energy generation sector, there could be city wide incentives for local generation that supplement state and federal programs. If energy thresholds are established for building types (see #1 above) then those developments that underperform set thresholds should be rewarded with pay backs from City Light up to say 5 years after occupation? This rewards the developer and not the users. The developer could set another set of incentives for users.

- Financing Options

It appears that this exercise has not fully explored all innovative financial options available. Perhaps a more detailed conversation with City Light's financial team could reveal interesting opportunities. There are opportunities for achieving better economies of scale through early integration of development, local energy generation and building value. If being more green increases value of properties, then that is counter productive to the city's affordable housing crisis. If development covers every inch of the city, then how can we integrate (even at a future date) local generation. If we are to use public tax dollars for financing private development then the payback to the public has to be immediate and clear. It seems that any sort of fee we impose on a development must present an opportunity for the building to over perform in order to waive that fee. Therefore perhaps another set of fees can be established after occupation – that is made applied to the users and not necessarily the developers...by default that will make more energy efficient buildings more desirable to potential tenants than those that are not.