Dear Governor Haley,

As you know, energy efficiency is the lowest-cost demand side energy resource — cheaper than electric or gas generation and renewables. Even with the U.S. Supreme Court’s recent stay of the Clean Power Plan, the electric power sector is evolving toward a cleaner, more efficient energy system. As the regulators and energy planners in your state continue their daily work to ensure reliable and affordable electricity to consumers, we encourage you to maximize your investment in energy efficiency. By reducing the need for central power generation, energy efficiency provides emissions reductions quickly, locally, and at a lower cost than other compliance options. It is also the only option that achieves sustained local job creation while also reducing emissions, mitigating the cost impacts of Clean Power Plan implementation, and giving South Carolina residents and businesses control over their energy bills. Actions such as improving manufacturing energy efficiency, reducing commercial buildings’ energy use, and delivering residential energy efficiency upgrades are the quickest and cheapest means to meet energy demand while simultaneously improving air quality.

Today, every state has at least some experience delivering energy efficiency programs administered by electric and natural gas utilities as well as the private sector. These programs have been very successful and can be expanded significantly. In addition, there are opportunities in South Carolina to achieve substantial emissions reductions through the implementation of non-utility administered energy efficiency policies and programs. Such programs include investments in combined heat and power, adoption of building energy codes that leverage above-code green building certification, residential retrofit financing programs and procurement of energy savings performance contracts (ESPCs) to upgrade large buildings and facilities. Non-utility efficiency programs, taken as a whole, generate as much investment in energy savings as utility programs and should not be underestimated. For example, the ESPC market in the U.S. generates more than $5 billion annually in new investments.

We commend the energy-efficiency investments South Carolina has already made, including initiating the programs targeted to promote energy-efficient manufactured homes and providing the state-run loan program for energy-efficiency investments. While South Carolina may not be supportive of the Clean Power Plan, if your state ultimately decides to submit a plan to avoid the imposition of a Federal Plan, we urge you to consider maximizing the use of this least-cost mechanism by expanding your existing energy efficiency policies and programs. To maximize cost-effective emissions reductions under the plan, we also recommend that you opt into the Clean Energy Incentive Program (CEIP).

The attached fact sheet shows how implementation of a few common energy-efficiency policies—such as adoption of an energy-savings target, updated building energy codes, and increased use of combined heat and power—can meet nearly 50 percent of South Carolina’s 2030 compliance goal under the Clean Power Plan, all while saving customers money and growing the South Carolina economy. In fact, utilizing
efficiency measures to reach South Carolina’s goal would save South Carolinians $1.2 billion, not to mention avoiding nearly 4.8 million tons of carbon dioxide emissions and reducing toxic air pollutants that negatively affect our health.

Energy efficiency is not a “new” resource; however, applying these tools to achieve carbon reduction goals under Section 111(d) of the Clean Air Act is an entirely new context. Several tools are available for your staff and responsible state agencies to guide your decisions about Clean Power Plan implementation options, regardless of whether you pursue a mass-based or a rate-based plan. For further information and to ask questions specifically about incorporating energy efficiency in your plan, please contact the National Association of State Energy Officials at http://cpp.naseo.org/asq, as well as any of the signatories below.

We are ready to work with you and your state officials to ensure that your efforts to reduce emissions via the Clean Power Plan or any other means are as cost-effective as possible. Energy efficiency is the cleanest, fastest, most cost-effective compliance strategy available, and has the most direct impact on controlling consumers’ utility bills. Energy efficiency is also embraced by the private sector for its low operating costs and its resilience and risk reduction value. Additionally, energy efficiency creates lasting, non-exportable jobs and grows the economy while reducing consumer costs. We encourage you to use it robustly, and we stand ready to assist you.

Cc: South Carolina Public Utilities Commission; South Carolina Energy Office; South Carolina Department of Health and Environmental Control, Bureau of Air Quality

Sincerely,

ABB Inc.
Jim Creevy, Senior Director, Government Affairs
Jim.creevy@us.abb.com

Alliance for Industrial Efficiency
Jennifer Kefer, Executive Director
jennifer@dgardiner.com

Alliance to Save Energy
Kelly Speakes-Backman, Senior Vice President of Policy and Research
ksbackman@ase.org

Ameresco
Ashley Patterson, Director of Government Affairs and Public Policy
apatterson@ameresco.com

American Chemistry Council
Rudy Underwood, Vice-President of ACC State Affairs
Rudy_underwood@americanchemistry.com

American Council for an Energy-Efficient Economy
Sara Hayes, Senior Manager and Researcher, Air and Climate Policy
shayes@aceee.org

**AMSEnergy Corp**  
Michael Sams, CEO & President  
michael.sams@amsenergy.com

**Bruce Harley Energy Consulting, LLC**  
Bruce W. Harley, Principal  
bruceharleyenergy@gmail.com

**Building Performance Institute (BPI)**  
Larry Zarker, CEO  
lzarker@bpi.org

**CALMAC**  
Mark M. MacCracken, CEO  
Mm@calmac.com

**Columbia University, School of International & Public Affairs**  
Lloyd Kass, Adjunct Faculty, Environmental Science and Policy Program  
lrk13@columbia.edu

**Danfoss**  
John Galyen, President, North America  
johngalyen@danfoss.com

**E4TheFuture**  
Stephen Cowell, Executive Director  
scowell@e4thefuture.org

**Ecothermal Filters**  
Darcy McMenamin, President and CEO  
Darcy@ecothermalfilters.com

**Efficiency First**  
Kara Saul Rinaldi, Government Affairs  
kara@anndyl.com

**Energy Resources Center**  
Cliff Haefke, Interim Director  
chaefk1@uic.edu

**Environment Texas**  
Sara E. Smith, Staff Attorney  
sara@environmentttexas.org

**Environmental and Energy Study Institute**  
Carol Werner, Executive Director
Cwerner@eesi.org

Hannon Armstrong
Robert Johnson, Senior Vice President at Hannon Armstrong Sustainable Infrastructure
rjohnson@hannonarmstrong.com

Home Performance Coalition
Kara Saul Rinaldi, Vice President of Government Affairs and Policy
ksaul-rinaldi@homeperformance.org

JW Crouse, Inc.
Jesse Crouse, President
jwcincps@verizon.net

Knauf Insulation
George R. Phelps, Public Affairs Manager
George.phelps@knaufinsulation.com

Lime Energy
Adam Procell, President and CEO
aprocell@lime-energy.com

NAESCO
Donald Gilligan, President
dgilligan@naesco.org

National Electrical Contractors Association (NECA)
Marco A. Giamberardino, MPA, Executive Director, Government Affairs
mgiamberardino@necanet.org

National Housing Trust
Todd Nedwick, Housing and Energy Efficiency Policy Director
tnedwick@nhtinc.org

North American Insulation Manufacturers Association
Curt Rich, President and CEO
crich@naima.org

Ohio Sustainable Business Council
Mayda Sanchez, Executive Director
Msanchez@ohiosbc.org

Owens Corning
John Libonati, Vice President of Government and Public Affairs
John.Libonati@owenscorning.com

Powder River Basin Resource Council
Bob LeResche, Chair
sanderson@powderriverbasin.org

**Schneider Electric**  
Anna Pavlova, Vice President, Government Relations  
Anna.Pavlova@schneider-electric.com

**Siemens Corporation**  
Tom Phillips, Senior Director, State & Local Government Affairs  
tom.phillips@siemens.com

**Stoney Point Farms**  
Larry Lambeth, President  
lamrtment@hotmail.com

**TerraShares**  
John Atkins, President  
jatkins@terrashares.com

**The Dow Chemical Company**  
Greg Bergtold, Business Advocacy & Policy Director  
gsbertold@dow.com

**Trane**  
Douglas M. Young, Energy Services Leader  
dmyoung@trane.com

**U.S. Green Building Council**  
Elizabeth Beardsley  
Ebeardsley@usgbc.org

**U.S. Green Building Council, North Carolina**  
Sara Montgomery, LEED Green Associate, Project Manager  
smontgomery@usgbc.org

**VEIC**  
Mary Sprayregen, Deputy Director, Policy and Public Affairs  
msprayregen@veic.org

**Veolia North America**  
Elinor Haider, Vice President, Market Development  
elinor.haider@veolia.com

**Washington Gas, a WGL Company**  
Doreen Hope, Federal Government & Business Relations  
dhope@washgas.com