March 2, 2016

The Honorable Gregg Abbot
Governor of Texas
PO Box 12428
Austin, TX 78711

Dear Governor Abbot:

As you know, energy efficiency is the lowest-cost demand side energy resource – cheaper than electric or gas generation, or 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 and concurrently reduces emissions while mitigating the cost impacts of Clean Power Plan implementation and giving Texas 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, and the private sector. These programs have been very successful and can be expanded significantly. In addition, there are opportunities in Texas to achieve substantial emission reductions through the implementation of non-utility administered energy-efficiency policies and programs. Such programs include investments in combined heat and power (CHP), 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 that Texas has made, including the new CHP installations, and the incentives provided through the Texas LoanSTAR program. While Texas 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 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 the 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 89 percent of Texas’s 2030 compliance goal under the Clean Power Plan, all while saving customers money and growing the Texas economy. In fact, utilizing efficiency
measures to reach Texas’s goal would save Texans $5.5 billion, not to mention avoiding 55 million tons of carbon dioxide, 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 incorporation of 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 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 the operating costs it saves and its value for resilience and risk reduction. 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: Texas Public Utilities Commission; Texas Comptroller of Public Accounts, State Energy Conservation Office; Texas Commission on Environmental 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
llamrtement@hotmail.com

TerraShares
John Atkins, President
jatkins@terrashares.com

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

U.S. Green Building Council
Elizabeth Beardsley
Ebeardsley@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