

## Garcia, Daniela

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**From:** Garcia, Daniela  
**Sent:** Monday, July 24, 2017 4:42 PM  
**To:** Kristjansson, Sue  
**Subject:** DOE RFI Comparison  
**Attachments:** Comparison\_Summary\_DOE RFI.docx

Hi Sue,

As you know overall the tone of the letters was very different. SW letter was more congratulatory of current DOE practices and offered less constructive criticism than SoCalGas.

Attached please find a more detailed report addressing points for each question.

Below is a quick summary of differences:

Statewide Letter	SoCalGas Letter
Supports shorter time gap (< 5 years) between final rule publication and compliance date for newly covered products.	Supports more emphasis on customer preference.
Claims that the EPCA anti-backsliding provision prevents DOE from repealing any existing rulemakings.	Criticized LCC Methodology
Claims that DOE overestimates equipment price increases and underestimates consumer benefits, using clothes washers and other electrically-powered residential equipment as the primary examples.	Emphasizes that every rulemaking has unique qualities, so retrospective studies shouldn't be over-generalized.
	Suggested that TDV or other time dependent valuations of energy should be considered for energy pricing.
	Supports the collection of more data and better application to consumer choice models. Recommends that DOE share all collected data for free to stakeholders

Please let me know if you have any questions.

Thank You,

*Daniela Garcia*

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