

From: [Hunt, Marshall](#)
To: ["Bijit Kundu"](#)
Cc: [Anderson, Mary](#)
Subject: RE: DOE RFI
Date: Thursday, July 06, 2017 11:48:20 AM
Attachments: [DRAFT Regulatory Reform Comments 3July2017_v1 0 mbh9.docx](#)

Bijit

Attached is the file with my comments.

Marshall B. Hunt
Professional Mechanical Engineer
Codes & Standards
Pacific Gas & Electric Company
415-260-7624
mbh9@pge.com

From: Bijit Kundu [mailto:BKundu@energy-solution.com]
Sent: Wednesday, July 05, 2017 9:03 AM
To: Hunt, Marshall
Cc: Anderson, Mary
Subject: FW: DOE RFI

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Hi Marshall,

Thank you for your input on the outline of comments in response to DOE's RFI on Regulatory Reform. The draft letter is attached and it is pretty meaty. We have had several calls with the CEC and the SW IOU team and the comments reflect the outcome of those discussions. There were a couple spots where your preliminary notes were not incorporated into the letter (see below). With question 1, CEC's feedback on the LED issue was that it may be better to find a technology neutral example. With the refrigerant rule, the CEC's feedback is that DOE can't control or influence EPA, so it may be better to leave out (so as to not draw attention to negative aspects about EE standards). Also, in drafting responses to Comment 3, I thought referencing specific test procedures may be a little too detailed for the response.

Feel free to review the draft letter and provide your thoughts. As always, we welcome your input.

Thanks,
Bijit

Bijit Kundu | Senior Project Manager | (510) 482-4420 x261

From: Bijit Kundu
Sent: Monday, July 3, 2017 6:04 PM

To: 'Anderson, Mary' <M3AK@pge.com>; John Barbor <JBarbour@semprautilities.com>; Reefer, Jeremy (JMReefe@semprautilities.com) <JMReefe@semprautilities.com>; Daniela Garcia <dgarcia3@semprautilities.com>; Charles Kim <Charles.Kim@sce.com>
Cc: Erin Linney <elinney@energy-solution.com>; Lauren Davis <ldavis@energy-solution.com>
Subject: RE: DOE RFI

Hello All,

Thanks for the extensive collaboration on this letter to-date. Please find attached the first draft of the letter for your review. There were some modifications and tweaks to the letter we made for flow or structure reasons. We have outlined these modifications briefly below. We look forward to this team's feedback. Mary, can you please schedule a call to review the letter so we can get feedback from the team this week?

- As agreed, we included some high-level impacts on the benefits of standards upfront in the letter and tied it to the objectives of the regulatory reform task group.
- We left out the how federal standards are an important aspect in the CA IOUs savings portfolio given this is only applicable in CA.
- We did not include the comments on LCC methodology improvements.
- Question 1: We did not include comments on LED quality standards or EPA refrigerant rule. We are confirming with Marshall he is OK with this.
- Question 1: We included a comment on considering multi-tier standards in DOE rulemakings as a way to reduce regulatory costs and burden. This is a new comment not previously discussed, so please review closely.
- Question 1: We omitted a comment on aligning with international standards organizations given the current political climate. Please let us know if you agree with omission or not.
- Question 2: Upon reading this question again, DOE was not asking for how they should prioritize rulemakings *in general*, but how they should prioritize rulemakings *for reform*. Our proposed comments were answering more the former, not the later. Because of this, I tried to be explicit on what the recommendations were included here. Please provide input on if this works or if you have a suggestion.
- Question 2: We left out the comment on consideration of systems due to concerns of federal preemption.
- Question 3: Added information on the benefits that have been quantified by retrospective studies since DOE was specifically looking for data about the benefits of regulations.
- Question 3: Left out comments on voluntary alternatives to HVAC test standards given it is a little too detailed and doesn't fit in the flow. We are confirming with Marshall he is OK with this.
- Question 5: Comments that we discussed for the question were instead included in Question 9.
- Question 6: Did NOT reference broken test procedures as we agreed.
- Questions 5, 7, 11: We included the phrase: "This question is beyond the scope of our comments."

Happy 4th!

Bijit

Bijit Kundu | Senior Project Manager | (510) 482-4420 x261

-----Original Appointment-----

From: Anderson, Mary [<mailto:M3AK@pge.com>]

Sent: Monday, June 26, 2017 11:43 AM

To: Anderson, Mary; John Barbor; Reefe, Jeremy (JMReefe@semprautilities.com); Daniela Garcia; Charles Kim; Bo White (bo@negawattconsult.com); Bijit Kundu; Erin Linney; Craig Tyler (craigtyler@comcast.net)

Subject: DOE RFI

When: Friday, June 30, 2017 1:00 PM-3:00 PM (UTC-08:00) Pacific Time (US & Canada).

Where: Conference call

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