

## Garcia, Daniela

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**From:** Kristjansson, Sue  
**Sent:** Thursday, August 3, 2017 11:11 AM  
**To:** Garcia, Daniela  
**Subject:** FW: IOU Comment Letter to DOE  
**Attachments:** Redline Regulatory Reform Comments\_SK\_NW\_20170712 marked up.docx

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**From:** Kristjansson, Sue  
**Sent:** Wednesday, July 12, 2017 3:24 PM  
**To:** 'Eilert, Patrick' <PLE2@pge.com>; 'Michelle Thomas (Michelle.Thomas@sce.com)' <Michelle.Thomas@sce.com>; Zeng, Kate <KZeng@semprautilities.com>  
**Subject:** IOU Comment Letter to DOE

Good afternoon managers,

Based on conversations I had with each of you we've modified the comment letter to reflect a more measured response to the DOE's inquiry. I see their RFI as an opportunity for us to shape where we want them to go and if we simply agree with all that has been in the past we run the risk of this administration eliminating EERE altogether (that is up for discussion and has some support). It behooves us to come up with valid and reasonable recommendations for improvement so that we can get through the next years and beyond.

I will note that we added the element of the furnace rule methodology and although I mentioned that we may be willing to remove that from the main letter with all four IOU's, I'm not sure that my upper management is supportive of that offer, they are still reviewing and feel that is an important element for us. Note that we are not requesting that the DOE throw out the Monte Carlo method, just conduct a review of how it interacts with the different measures that are considered and have a good peer review of the result to ensure we don't end up where we did with the furnace rule. I think it's a reasonable request.

Please review the attached revised (redline) version to see if we are able to find common ground and sign on together as the four California IOU's. If you could review as quickly as possible and get back to me, we are low on time with the comments due on Friday.

Thanks!

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