Garcia, Daniela

From: Garcia, Daniela
Sent: Monday, July 10, 2017 10:16 AM
To: Bo White
Cc: Marc Esser
Subject: RE: [EXTERNAL] Re: FW: DRAFT DOE RFI Comment Letter
Attachments: FINAL DRAFT Regulatory Reform Comments 9July2017_CLEAN_v2.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Ok, so with these concerns for #3 & #4 can you add those comments into the attached version.

Thanks!

Daniela García
SoCalGas Customer Programs
Project Manager – Building Codes and Appliance Standards
555 W. 5th Street, Los Angeles, CA 90013 | ML: GT19A6
Office: 213-244-4361 | Mobile: 951-847-1022
DGarcia3@semprautilities.com

From: Bo White [mailto:bo@negawattconsult.com]
Sent: Monday, July 10, 2017 9:45 AM
To: Garcia, Daniela <DGarcia3@semprautilities.com>
Cc: Marc Esser <marc@negawattconsult.com>
Subject: [EXTERNAL] Re: FW: DRAFT DOE RFI Comment Letter

I compared the latest IOU letter to my edits, and here are a few things I noticed:

1. Even though they didn't expand the EPCA quote in the "EPCA Requirements" section, they did add a quote for the most important part that was missing previously, anti-backsliding, to the "Question 4" section.
2. While they didn't use my "electrically-powered" wording, they did revise one sentence about one of the related studies, "Mauer, et al. 2013", like this: "One study examined the impacts of energy efficiency standards on ten residential and commercial lighting products." I like that this excludes gas, but it doesn't seem completely accurate. The products included refrigerators, clothes washers, dishwashers, and a few other non-lighting products.
3. They didn't address electricity versus gas in their discussion about the other price-related study, "Nadel and deLaski 2013". Perhaps they can instead add a footnote listing the equipment types which were refrigerators, clothes washers, electric WHs, non-electric WHs (the only gas product), central AC, room AC, commercial AC, and ballasts.
4. They didn't materially modify their first sentence about this overall topic in the "EPCA Requirements" section. Perhaps there is different wording we can all agree upon.

I think my point #1 above is resolved, #2 is a minor issue, and #3 and #4 are my main concerns.

On Mon, Jul 10, 2017 at 8:09 AM, Garcia, Daniela <DGarcia3@semprautilities.com> wrote:

Marc and Bo,

Attached please see the latest version of the DOE RFI. At first glance they didn't accept any changes on the EPCA Legal Requirements section. Also, under Q3 they did not accept "of mostly electrically-powered products" in the various sections.

I have a call this AM with the IOUs only at 9 then at 10am to discuss with Sue, I should have a better idea of our position by noon. I will then be able to get clarification on the question in a previous email. (Are you signing the IOU letter then just adding in some comments as SoCalGas etc.) Also, since they didn't accept the EPCA Legal section what are your thoughts? Would we just comment as SoCalGas on the LCC and that section and sign the IOU letter? I want to go in with a proposal or an idea when I meet with Sue.

Thank You,

Daniela Garcia

SoCalGas Customer Programs

Project Manager – Building Codes and Appliance Standards

555 W. 5th Street, Los Angeles, CA 90013 | ML: GT19A6

Office: 213-244-4361 | Mobile: 951-847-1022

DGarcia3@semprautilities.com

From: Bijit Kundu [mailto:BKundu@energy-solution.com]
Sent: Sunday, July 9, 2017 7:42 AM
To: Anderson, Mary <M3AK@pge.com>; Barbour, John L <JBarbour@semprautilities.com>; Reefe, Jeremy <JMReefe@semprautilities.com>; Garcia, Daniela <DGarcia3@semprautilities.com>; Charles Kim <Charles.Kim@sce.com>; mbh9@pge.com
Cc: Erin Linney <elinney@energy-solution.com>; Lauren Davis <ldavis@energy-solution.com>
Subject: [EXTERNAL] RE: DRAFT DOE RFI Comment Letter

All,

On Friday afternoon I received some suggested edits from Kristen's team at CEC. The few updates incorporated in the letter are clarifying only and do not alter the substance of the comments. I have included the updated letter (in tracked changes and clean) and denoted "v2." As noted below, we are looking for final approvals no later than July 12. Please reply all in your approval notification since I will be on vacation and inaccessible this week.

- Final Approval Received: SCE
- Final Approval Pending: SDGE, SoCalGas, PGE

Thanks,

Bijit

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

From: Bijit Kundu
Sent: Friday, July 7, 2017 1:33 PM
To: 'Anderson, Mary' <M3AK@pge.com>; John Barbor <JBarbour@semprautilities.com>; Reefe, Jeremy (JMReefe@semprautilities.com) <JMReefe@semprautilities.com>; Daniela Garcia <dgarcia3@semprautilities.com>; Charles Kim <Charles.Kim@sce.com>; Marshall Hunt (MBH9@pge.com) <MBH9@pge.com>
Cc: Erin Linney <elinney@energy-solution.com>; Lauren Davis <ldavis@energy-solution.com>
Subject: RE: DRAFT DOE RFI Comment Letter

All,

Please find attached two versions of the CA IOU comment letter: one is tracked changes and the other a clean version. The current draft (noted as Final Draft) incorporates the suggested edits from the following parties:

- PGE: Addressed comments and updated sections based on reviews from Marshall Hunt and Mary.
- SoCalGas: Addressed comments and updated sections based on reviews from Adam and Negawatt.
- SCE: Addressed comments and updated sections based on reviews from Charles and Michelle.

- SDG&E: Addressed comments and updated sections based on a couple different reviews from John.

Updates

A run-down of the major updates include:

- Reference of CA IOUs instead of Utility Coalition.
- Modification of "This question is beyond the scope…" to "No comment" for simplicity.
- Use of the median price increases from the ASAP study to avoid the confusion with the average increase.
- Added and anecdotal note about light bulbs as an example of standards driving innovation.
- Edits throughout for clarity/correctness.

Approvals

The following is the approval status by utility. **Please reply all in your approval notification since I will be on vacation and inaccessible next week**. Mary has asked for final approvals no later than July 12.

- Final Approval Received: SCE
- Final Approval Pending: SDGE, SoCalGas, PGE

Please let the Energy Solutions Team (Erin, Lauren, and me) know if you have any other feedback on this letter.

Thanks,

Bijit

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

From: Anderson, Mary [mailto:M3AK@pge.com]
Sent: Monday, July 3, 2017 7:36 PM

To: John Barbor <JBarbour@semprautilities.com>; Reefe, Jeremy (JMReefe@semprautilities.com) <JMReefe@semprautilities.com>; Daniela Garcia <dgarcia3@semprautilities.com>; Charles Kim <Charles.Kim@sce.com>
Cc: Bijit Kundu <BKundu@energy-solution.com>; Erin Linney <elinney@energy-solution.com>
Subject: DRAFT DOE RFI Comment Letter

Attached is the draft comment letter on the DOE RFI. I appreciate everyone's time to get the outline done, this is a pretty meaty letter. Please review and send Bijit and I your comments by COB July 10, 2017. We will revise the letter and get it back to the team by July 12th for final approval. If you have any questions please let me know. Thanks!!!

Mary

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Thank you,

Bo White, PE
NegaWatt Consulting, Inc.
(619) 309-4191
www.negawattconsult.com