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To: [Hogle, Jessica](#)
Cc: [Zelmar, Karen](#); [Dewey, Meghan](#); [Eilert, Patrick](#)
Subject: DOE Request for Information Comment Letter
Date: Monday, July 03, 2017 12:12:21 PM

Jessica,

DOE released a Request for Information (RFI)"seeking comments and information from interested parties to assist DOE in identifying existing regulations, paperwork requirements and other regulatory obligations that can be modified or repealed, consistent with law, to achieve meaningful burden reduction while continuing to achieve the Department's statutory obligations." Comments are due July 14, 2017. The CA IOUs are working on a response to the RFI in reference to the Appliance Standards program. There is consensus on the majority of the response but SCG may submit their own letter to recommend updating the Lifecycle Cost analysis, which has been the basis for pushing back on proposed natural gas standards. The CEC has noted that they are not supportive of SCG's LCC comment and the other IOUs want to remain silent on it. I am also collaborating with all of the utilities in Massachusetts to submit similar comments to the RFI.

The IOUs are including a section at the beginning of the letter to summarize the benefits of standards. The team is not responding to all questions in the RFI, the questions that will be included in our response below.

Please let me know if you have any questions or concerns about any of the content below.

Mary

- **Jobs**
 - Lower utility bills for consumers means larger macroeconomic benefits to the US economy – including creation of jobs
 - Costs of EE regulations are likely overestimated by DOE (cite ASAP paper)
- **Utility Sector**
 - Advocacy on EE regulations are a significant component in the utilities EE portfolio and the most cost-effective program
 - Regulations establish test procedures that provide the foundation for incentive programs
 - EE regulations reduce utilities costs by not having to build new power plants or contract for additional capacity to meet increasing demand which would increase costs for customers
 - Peak demand reduction: prevent use of expensive peaker plants
- **General Benefits**
 - All DOE efficiency regulations adopted have benefits that far exceed the costs
 - It has been shown (in the US and elsewhere) that energy efficiency is great for the economy. Apart from the direct energy cost savings and job benefits, it fosters innovation, which in turn helps a country stay competitive internationally. Ever-tighter DOE standards are a great way to ensure the US doesn't fall behind in this respect.
- **Consumer Benefits**
 - Appliance regulations bridge the split incentive problem for tenants who do not buy major energy consuming appliances
 - EE regulations fosters US manufacturers innovation to make products which perform better performing and feature-rich – increasing customer satisfaction
 - More efficiency appliances help meet state and local building code regulations which

lowers costs for builders and owners

- **Enhancements**

- Support working with states to reduce duplicative reporting burdens
- Support ASRAC working group efforts as a way to streamline regulations
- Stage test procedures and standards to allow sufficient time to review the test procedure before beginning the standard. The test procedure should be available for review but not necessarily final.

DOE Questions for Stakeholder Comment

(1) How can DOE best promote meaningful regulatory cost reduction while achieving its regulatory objectives, and how can it best identify those rules that might be modified, streamlined, or repealed?

- Uniform LED quality standards – No CEC objections but may want to focus on tech neutral standards
- ASRAC Process – DOE does not need to hire a consultant for gathering data, performing LCC, etc. ASRAC can provide specific regulatory requirements to the DOE. – May not provide a significant savings. Need to review

(2) What factors should DOE consider in selecting and prioritizing rules and reporting requirements for reform?

- Nation energy use is required but regional impacts are also important
- The water/energy nexus is ignored but important in the dry southwestern USA
- DOE should use voluntary standards as the basis of the mandatory standard to reduce the cost to regulate

(4) Are there regulations that simply make no sense or have become unnecessary, ineffective, or ill-advised and if so what are they? Are there rules that can simply be repealed without impairing DOE's statutory obligations and, if so, what are they?

- Cite regulatory language on current requirements

(6) Are there rules that are still necessary, but have not operated as well as expected such that a modified, or slightly different approach at lower cost is justified?

- Highlight rulemakings where DOE chose the inappropriate metrics (i.e., metrics that does not reflect the real-world situation well. An example is cloth washer) or test procedure.

(8) Does DOE currently collect information that it does not need or use effectively?

- No, DOE needs to collect information in order to make regulations (fact driven) and for enforcement.