

Garcia, Daniela

From: Garcia, Daniela
Sent: Monday, June 19, 2017 1:28 PM
To: Marc Esser
Cc: Bo White
Subject: RE: [EXTERNAL] Re: FW: DOE RFI
Attachments: DOE Regulatory Reform RFI Summary 7June2017 mbh9_bk.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Thanks Marc! Attached please find the draft.

Daniela Garcia

SoCalGas Customer Programs
Project Manager – Building Codes and Appliance Standards
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DGarcia3@semprautilities.com

From: Marc Esser [mailto:marc@negawattconsult.com]
Sent: Monday, June 19, 2017 1:16 PM
To: Garcia, Daniela <DGarcia3@semprautilities.com>
Cc: Bo White <bo@negawattconsult.com>
Subject: [EXTERNAL] Re: FW: DOE RFI

Hi Daniela,

interesting RFI, worth commenting on. PG&E's ideas seem like a good start; we will have some additional ideas shortly; Bo has already started thinking it through. We'll send you something after we see the updates to the draft you mentioned.

On Mon, Jun 19, 2017 at 9:57 AM, Garcia, Daniela <DGarcia3@semprautilities.com> wrote:

- The statewide IOUs are looking to comment on the DOE RFI: <https://www.gpo.gov/fdsys/pkg/FR-2017-05-30/pdf/2017-10866.pdf>

Can you please review the RFI and I will forward a revised draft for our input after my call this morning.

Daniela Garcia

SoCalGas Customer Programs
Project Manager – Building Codes and Appliance Standards

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From: Hunt, Marshall [mailto:MBH9@pge.com]

Sent: Monday, June 19, 2017 9:51 AM

To: Anderson, Mary <M3AK@pge.com>; Charles Kim <Charles.Kim@sce.com>; Eilert, Patrick <PLE2@pge.com>;
Barbour, John L <JBarbour@semprautilities.com>; 'randall Higa' <randall.higa@sce.com>; Garcia, Daniela
<DGarcia3@semprautilities.com>; Elliott, Ed <ESE1@pge.com>; Craig Tyler (craigtyler@comcast.net)
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<JMReefe@semprautilities.com>

Subject: [EXTERNAL] RE: DOE RFI

I have started editing this document but have not finished all of the questions.

But, I hope this will support our deliberations.

Marshall B. Hunt

Professional Mechanical Engineer

Codes & Standards

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

From: Anderson, Mary

Sent: Friday, June 16, 2017 1:40 PM

To: Anderson, Mary; Charles Kim; Eilert, Patrick; John Barbor; 'randall Higa'; Daniela Garcia; Hunt, Marshall; Elliott, Ed;
Craig Tyler (craigtyler@comcast.net); Bijit Kundu; Reefer, Jeremy (JMReefe@semprautilities.com)

Subject: DOE RFI

When: Monday, June 19, 2017 10:00 AM-11:00 AM (UTC-08:00) Pacific Time (US & Canada).

Where: Conference Call Info Below

<< File: DOE Regulatory Reform RFI Summary 7June2017.docx >>

DOE has released an RFI on how to streamline improve regulations. We would like to discuss the potential comments. Please see the potential comments below.

Summary of Key Issues and Potential Comments

Topic: DOE shall identify regulations that... *(i) Eliminate jobs, or inhibit job creation; (ii) Are outdated, unnecessary, or ineffective; (iii) Impose costs that exceed benefits...*

- **Jobs**
- Lower utility bills for consumers means larger macroeconomic benefits to the US economy – including creation of jobs
- Costs are likely much smaller (cite ASAP paper)
- [Research specific US manufacturers who have increased product lines/market share due to innovations in response to standards – Cree, others]
- **Utility Sector**
- EE regulations provides the stick to the carrot of incentive programs. Without mandatory regulations, incentive programs can become outdated with limited savings opportunities
- Advocacy on EE regulations are a significant component in the utilities EE portfolio and the most cost-effective program
- EE regulations reduce utilities' capital costs by not having to build new power plants to meet increasing demand
- Peak demand reduction: prevent use of expensive peaker plants
- Test procedures regulations for incentive programs
- **General Benefits**
- All DOE efficiency regulations adopted have benefits that far exceed the costs
- Cite statutory requirement in EPCA

- **Consumer Benefits**

- Lower utility bills means more spending power
- EE regulations allows US manufacturers to innovate products to make them 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

- **Statutory Requirements**

- Cite EPCA and cost-benefit requirements, periodic review of rules
- Anti-backsliding provision

- **Rulemaking Enhancements**

- Support working with states to reduce duplicative reporting burdens
- Support ASRAC working group efforts as a way to streamline regulations

References

- RFI: <https://www.gpo.gov/fdsys/pkg/FR-2017-05-30/pdf/2017-10866.pdf>
- ASAP Jobs Paper: <http://appliance-standards.org/sites/default/files/Appliance-and-Equipment-Efficiency-Standards-Money-Maker-Job-Creator.pdf>
- ASAP Better Appliance Paper: [https://appliance-standards.org/sites/default/files/Better Appliances Report.pdf](https://appliance-standards.org/sites/default/files/Better_Appliances_Report.pdf)
- ASAP Comparing Predicted and Observed Prices: [https://appliance-standards.org/sites/default/files/Appliance Standards Comparing Predicted Expected Prices.pdf](https://appliance-standards.org/sites/default/files/Appliance_Standards_Comparing_Predicted_Expected_Prices.pdf)
- Executive Order 13771: Reducing Regulation and Controlling Regulatory Costs
- <https://www.gpo.gov/fdsys/pkg/FR-2017-02-03/pdf/2017-02451.pdf>
- Executive Order 13783: Promoting Energy Independence and Economic Growth
- <https://www.gpo.gov/fdsys/pkg/FR-2017-03-31/pdf/2017-06576.pdf>

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