

## Garcia, Daniela

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**From:** Garcia, Daniela  
**Sent:** Wednesday, July 5, 2017 9:09 AM  
**To:** Marc Esser; Bo White  
**Subject:** RE: (External):DRAFT DOE RFI Comment Letter

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

I am reviewing the latest version now and they have made quite a few changes with some new comments.

Below is Bijit's outline of changes/updates:

- 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."

Can you please review the entire letter as well and let me know if you have any concerns.

Thanks!

*Daniela García*

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**From:** Garcia, Daniela  
**Sent:** Wednesday, July 5, 2017 8:58 AM

**To:** 'Marc Esser' <marc@negawattconsult.com>; Bo White <bo@negawattconsult.com>

**Subject:** FW: (External):DRAFT DOE RFI Comment Letter

Marc,

Attached is the latest version. They did take out the LCC comment which I am pending guidance on whether that puts us in a position where we would file separately. For your item #1 I think we just hadn't brought it up on the call. Can you add in this version of the letter and we can send around to see other's thoughts.

Thanks!

*Daniela Garcia*

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**From:** Charles Kim [<mailto:Charles.Kim@sce.com>]

**Sent:** Wednesday, July 5, 2017 8:56 AM

**To:** Bijit Kundu <[BKundu@energy-solution.com](mailto:BKundu@energy-solution.com)>

**Cc:** Erin Linney <[elinney@energy-solution.com](mailto:elinney@energy-solution.com)>; Anderson, Mary <[M3AK@pge.com](mailto:M3AK@pge.com)>; Barbour, John L <[JBarbour@semprautilities.com](mailto:JBarbour@semprautilities.com)>; Reeve, Jeremy <[JMReeve@semprautilities.com](mailto:JMReeve@semprautilities.com)>; Garcia, Daniela <[DGarcia3@semprautilities.com](mailto:DGarcia3@semprautilities.com)>

**Subject:** [EXTERNAL] RE: (External):DRAFT DOE RFI Comment Letter

Dear Bijit,

My comments are attached. Would you please let me know if my comments make sense to you ASAP (especially the sentence that contains "108 percent")?

If you are O.K. with my comments, can you send a cleaner version ASAP so that I can take steps to get approvals?

Thank you.

P.S. This comment letter is far better than I expected. Thank you.

**Charles J. Kim, P.E.**

Sr. Engineer

Energy Codes and Standards

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

**Sent:** Monday, July 03, 2017 7:36 PM

**To:** John Barbor <[JBarbour@semprautilities.com](mailto:JBarbour@semprautilities.com)>; Reefe, Jeremy ([JMReefe@semprautilities.com](mailto:JMReefe@semprautilities.com))

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**Cc:** Bijit Kundu <[BKundu@energy-solution.com](mailto:BKundu@energy-solution.com)>; Erin Linney <[elinney@energy-solution.com](mailto:elinney@energy-solution.com)>

**Subject:** (External):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 12<sup>th</sup> for final approval. If you have any questions please let me know. Thanks!!!

Mary

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