

From: [Eilert, Patrick](#)
To: ["Craig Tyler \(craigtyler@comcast.net\)"](#)
Subject: FW: IOU Comment Letter to DOE
Date: Thursday, July 13, 2017 9:27:38 AM

Mary-

Many thanks for the great draft.

Do you and Craig support the following version, to be sent later today?

Pat

Sue-

Many thanks for your comments. I recommend that we have separate letters for following reasons.

- The tone on the letter is more critical than PG&E believes is appropriate for a ratepayer funded comment letter that isn't entirely supportive of the program and work that has been completed over the last decade. Additionally, our DC office supports the tone and content of the previous version.
- We are not comfortable going against the CEC. The IOUs have worked closely with the CEC on comments and the CEC were supportive of the previous comment version. Also, PG&E agrees with the CEC and DOE that LCC + Monte Carlo is the best way to incorporate uncertainty into standards analyses.
- At the last metrics conversation (6/30) ORA commented that the IOUs should be reporting federal rulemakings where they did not support the DOE proposed level. We are not comfortable with a letter that unnecessarily provides fodder for negative comments.
- PG&E shared a copy of the previous version of the letter with the MA utilities (including National Grid). They have made modifications and will be submitting a similar letter. We are not comfortable drastically modifying our letter after working with them to provide comments
- There are too many differences to resolve before tomorrow. The appliances subprogram team has been working on this letter for weeks and the latest from SCG is a significant departure. The letter is not perfect but we believe it already embodies compromises already worked out by the appliances subprogram team.

Would you support a managers +1 meeting in the near future to discuss the process for developing future letters?

Thank you.

Pat

From: Anderson, Mary
Sent: Wednesday, July 12, 2017 9:35 PM
To: Eilert, Patrick; Craig Tyler (craigtyler@comcast.net)
Subject: RE: IOU Comment Letter to DOE

Here is my draft of the comments on the SCG letter.

I appreciate getting a copy of your comments although I am disappointed that the comments didn't come sooner in the review process. But I understand that executive review is difficult to manage. The Appliance team spent a significant number of hours reviewing these comments and with multiple iterations and your update is a significant departure from the previous version. Two of the IOUs have already submitted approvals and PG&E has received approval from our DC office to submit the original letter. We have a few overarching comments on your letter.

- The tone on the letter is more critical that PG&E believes is appropriate for a ratepayer funded comment letter, it isn't entirely supportive of the program and work that has been completed over the last decade. I understand that SCG believes that this is necessary to support EERE going forward but I am not sure we agree with that assessment.
- The IOUs have worked closely with the CEC on the comments and the CEC were supportive of the previous comments letter. The IOU team had shared previous comments on the LCC analysis with the CEC and the CEC wasn't supportive of the LCC comment. We are not comfortable going against the CEC.
- At the last metrics conversation (6/30) ORA made a very pointed comment that the IOUs should be reporting federal rulemakings where they did not support the DOE proposed level and specifically called out SCG in this regard. I am not comfortable that this letter will not unnecessarily provide fodder for negative comments from stakeholders in the Business Plan process.
- PG&E shared a copy of the previous version of the letter with the MA utilities (including National Grid) and they have made modifications and will be submitting a similar letter. I am not comfortable drastically modifying our letter after working with them to provide comments.

As the IOUs have worked through comments over the last month there was an agreement that the IOUs can submit separate RFI comment letters since there may be different policy stances on the RFI questions. I am not comfortable with signing on to this version of the letter but believe that SCG and any other IOUs should sign on to this letter if this letter is a better match for their own

From: Eilert, Patrick
Sent: Wednesday, July 12, 2017 4:08 PM
To: Anderson, Mary
Subject: FW: IOU Comment Letter to DOE

Let's discuss. I committed to reviewing this latest version, but not to making any specific changes.

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

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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!

Sue Kristjansson

Codes & Standards and ZNE Manager

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