Garcia, Daniela

From: Garcia, Daniela
Sent: Thursday, June 22, 2017 4:45 PM
To: Marc Esser
Cc: Bo White
Subject: RE: [EXTERNAL] Re: Re: Re: Re: FW: DOE RFI
Attachments: DOE Regulatory Reform RFI Summary_SCG.docx

Follow Up Flag: Follow up
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Apologies, I am moving too fast today. In the attached I have added in 2 points under ***enhancements***. If you can beef up the LCC one and add to Marshall's (your item #5 below) in the attached draft then I can send to Sue so we can add in #4 if AGA, APGA has anything else we can piggy back off of.

Sorry for the confusion and multiple emails. Please let me know if you have any questions.

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: Garcia, Daniela
Sent: Thursday, June 22, 2017 4:30 PM
To: Marc Esser <marc@negawattconsult.com>
Cc: Bo White <bo@negawattconsult.com>
Subject: RE: [EXTERNAL] Re: Re: Re: Re: FW: DOE RFI

No, sorry I glanced over this very quickly. A copy and paste is not necessary. I will look at the draft and see if and where these comments can be embedded. If a full comment needs to be written up then that can discussed after the meeting on Monday. Comment deadline is July 14th.
I forwarded you both the invite to see if you can attend the next meeting, Monday, 10am.

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From: Marc Esser [mailto:marc@negawattconsult.com]
Sent: Thursday, June 22, 2017 4:10 PM
To: Garcia, Daniela <DGarcia3@semprautilities.com>
Cc: Bo White <bo@negawattconsult.com>
Subject: [EXTERNAL] Re: Re: Re: Re: FW: DOE RFI

I am happy to copy and paste my list into the word document... but should we briefly discuss and see if you agree with our points, and if the wording is good enough?

On Thu, Jun 22, 2017 at 4:02 PM, Garcia, Daniela <DGarcia3@semprautilities.com> wrote:

> Now it's really attached ☺

From: Garcia, Daniela
Sent: Thursday, June 22, 2017 4:02 PM
To: Marc Esser <marc@negawattconsult.com>
Cc: Bo White <bo@negawattconsult.com>
Subject: RE: [EXTERNAL] Re: Re: Re: FW: DOE RFI

Marc,

Comments can be embedded in the draft, attached.

Daniela Garcia

SoCalGas Customer Programs

Project Manager – Building Codes and Appliance Standards

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

DGarcia3@semprautilities.com

From: Marc Esser [mailto:marc@negawattconsult.com]
Sent: Thursday, June 22, 2017 3:02 PM
To: Garcia, Daniela <DGarcia3@semprautilities.com>
Cc: Bo White <bo@negawattconsult.com>
Subject: [EXTERNAL] Re: Re: Re: FW: DOE RFI

Hi Daniela,

in general, we are supportive of PG&E's points; they are well thought through and valid. We have a few additional suggestions, though.

1. reminding the DOE of the statutory requirements is something that we may want to leave to legal teams, and only reference that here. You may know that 11 states are suing the DOE over not doing its job (California included); any arguments the technical teams at the IOUs make related to that may be too weak or imprecise compared to what lawyers can come up with.

    1. Related to that, I am having a hard time wrapping my head around how the DOE thinks they can get away with each new rule resulting the removal of two others, where they see the benefit, and what it would actually mean if they got away with it. Would they just delete proposed rules, and the old standards stay in effect? Or would they delete entire products, and pre-emption would go away, and then the states are in charge?

2. You may want to consider whether you should reiterate our and other's concerns with the LCC methodology. If they could be addressed more assertively than they have been in the past, IMHO this would address DOE looking to identify "ineffective" process.

3. This is another opportunity to request decoupling of simultaneous rulemaking for new efficiency standards the underlying test procedures

4. Have you sought out opinions of AGA, APGA, Spire, etc? They may have some points that we can side with. I am reaching out to them now.

5. It has been shown (in the US and elsewhere) that energy efficiency is great for the economy... apart from the direct $ and job benefit, it fosters innovation, which in turn helps a country stay competitive internationally. The ever tighter DOE standards are a great way to ensure the US doesn't fall behind in this respect. I think that point is made in Marshall's paper, but I feel that it should be more prominent/stronger. It aligns with Trump-think more than most other arguments that we'll make, so the DOE will be more inclined to accept it. We can find sources to make that point if needed.

Do you think we can help write some of the response, or are we better off waiting for a first draft, and then make edits?

Marc

On Tue, Jun 20, 2017 at 11:53 AM, Garcia, Daniela <DGarcia3@semprautilities.com> wrote:

> Yes, that would be good.
>
> Thanks!
>
> **Daniela Garcia**
>
> SoCalGas Customer Programs
>
> Project Manager – Building Codes and Appliance Standards
>
> 555 W 5th Street, Los Angeles, CA, 90013 | ML GT19A6
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> Office: 213-244-4361 | Mobile: 951-847-1022
>
> **DGarcia3@semprautilities.com**

On Jun 20, 2017, at 11:48 AM, Marc Esser <marc@negawattconsult.com> wrote:

Thanks Daniela. Would it be ok if we get back to you by Thursday mid-day?

Marc

On Mon, Jun 19, 2017 at 1:28 PM, Garcia, Daniela <DGarcia3@semprautilities.com> wrote:

Thanks Marc! Attached please find the draft.

Daniela Garcia

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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 García

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DGarcia3@semprautilities.com

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) <craigtyler@comcast.net>; Bijit Kundu <BKundu@energy-solution.com>; Reefe, Jeremy <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

Pacific Gas & Electric Company

415-260-7624

mbh9@pge.com

-----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; Reefe, 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

- ASAP Comparing Predicted and Observed Prices: 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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