# Summary of Differences Between PG&E-led and SoCalGas Letters

The PG&E letter cited DOE literature and environmental advocate research claiming expansive nationwide energy and cost savings due to past DOE EERE rulemakings. They cite EPCA, including the anti-backsliding provision, and claim that all prior rulemakings were economically justified, with savings likely greater than predicted by DOE. The PG&E letter does offer a few suggestions for improvements to future rulemakings

The SoCalGas letter praises DOE and EPA’s Energy Star program for realizing nationwide savings and spurring innovation. However, the letter offers more constructive criticism, including to completed and near-completed (e.g. furnace) rulemakings.

Here below is a table of the major points by each party for each question.

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| *Question 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achieving its regulatory objectives, and how can it best identify those rules that might be modified, streamlined, or repealed?* |
| PG&E-led | SoCalGas |
| * Supports more extensive use of ASRAC, used the commercial package air conditioners final rule as an example of success, and supports multi-tier standards.
 | * Qualified support for the ASRAC process.
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| *Question 2: What factors should DOE consider in selecting and prioritizing rules and reporting requirements for reform?* |
| PG&E-led | SoCalGas |
| * Supports regional regulations and used the residential central air conditioners and heat pumps rulemaking as an example of success.
* Supports shorter time gap (< 5 years) between final rule publication and compliance date for newly covered products.
 | * Supports more emphasis on customer preference.
* Supports de-prioritization of equipment when above-code equipment is already often preferred by customers.
* Supports regional regulations.
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| *Question 3: How can DOE best obtain and consider accurate, objective information and data about the costs, burdens, and benefits of existing regulations? Are there existing sources of data DOE can use to evaluate the post-promulgation effects of regulations over time? We invite interested parties to provide data that may be in their possession that documents the costs, burdens, and benefits of existing requirements?* |
| PG&E-led | SoCalGas |
| * Claims that DOE overestimates equipment price increases and underestimates consumer benefits, using clothes washers and other electrically-powered residential equipment as the primary examples.
 | * Acknowledges environmental advocate research on this topic but urges DOE to also find research by other groups.
* Emphasizes that every rulemaking has unique qualities, so retrospective studies shouldn’t be over-generalized.
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| *Question 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?* |
| PG&E-led | SoCalGas |
| * Claims that the EPCA anti-backsliding provision prevents DOE from repealing any existing rulemakings.
 | * Critiqued the LCC Methodology
* Stated that these criticisms apply to future rulemakings as well as the furnace rulemaking, which is not finalized.
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| *Question 5: Are there rules or reporting requirements that have become outdated and, if so, how can they be modernized to better accomplish their objective?* |
| PG&E-led | SoCalGas |
| * No comment.
 | * Suggested that TDV or other time dependent valuations of energy should be considered for energy pricing.
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| *Question 8: Does DOE currently collect information that it does not need or use effectively?* |
| PG&E-led | SoCalGas |
| * Supports the collection of more data.
 | * Supports the collection of more data.
* Supports better application of data to consumer choice models.
* Recommends that DOE share all collected data for free to stakeholders.
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| *Question 9: Are there regulations, reporting requirements, or regulatory processes that are unnecessarily complicated or could be streamlined to achieve statutory obligations in more efficient ways?* |
| PG&E-led | SoCalGas |
| * Supports no overlap of test procedures and energy conservation standards.
* Supports collaboration with EPA, CEC, and others to reduce duplicated work.
* Support improvement of compliance certification database.
 | * Similar comments to PG&E-led letter, but added a critique of the LCC methodology.
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