

DOCKETED

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PG&E Comments on Water Appliance and Fixture Rebate Program

Additional submitted attachment is included below.

July 28, 2015

**VIA E-MAIL DOCKET@ENERGY.
CA.GOV**California Energy Commission
Dockets Office, MS-4
Docket No. 15-WATER-03
1516 Ninth Street
Sacramento, CA 95814-5512Re: Docket 15-WATER-03: California's Drought Response Staff Workshop on Water
Appliance Rebate Program.**I. INTRODUCTION**

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to provide comments on the Water Appliance and Fixture Rebate Program (the Program) and to respond to the information presented at the California Energy Commission (CEC) and Department of Water Resources (DWR) Staff Workshop in Oakland on July 16, 2015. PG&E has previously indicated its support of this Program during an April 7, 2015 meeting with CEC advisors and staff, and in a letter to Chair Weisenmiller dated May 14, 2015.¹ The CEC and DWR are well positioned to effectively advance the energy-related initiatives they have been tasked with, and PG&E looks forward to working with the CEC and DWR to accomplish those goals.

Since the 1970s, PG&E has been a leader in energy efficiency and has worked closely with government, nonprofit, and private sector partners to design and implement programs and policies that allow Californians to do more with less energy. PG&E's energy efficiency portfolio includes a robust suite of rebates, incentives, services, and tools to provide every customer choices from a comprehensive set of tools and technologies through multiple delivery channels to help them reduce energy usage and save money. These programs and services are supported by utility staff, government partnerships, trade professionals, retailers, distributors, manufacturers, and other third-party providers. From 2010-2014, PG&E's energy efficiency programs helped customers avoid the release of more than 2,000,000 metric tons of carbon dioxide (CO₂), which is equal to the annual greenhouse gas emissions from nearly 460,000 passenger cars or more than 1,400,000 homes in PG&E's service territory.²

¹ Letter from PG&E to CEC Chair Weisenmiller, May 14 2015. Retrieved from:
http://docketpublic.energy.ca.gov/PublicDocuments/15-WATER-03/TN204700_20150522T141311_Valerie_Winn_Comments_PGE_Drought_Support_Letter.pdf

² PG&E Internal Data from Customer Data Warehouse, 2010-2014 inclusive.

As discussed previously, PG&E has extensive experience, tested processes, and well-established retail and manufacturer relationships in the appliance rebate arena that allow us to easily deploy incentive programs and educational initiatives to customers. Over the past several years, PG&E has partnered with dozens of water agencies to deploy successful rebate programs and has maintained those strong relationships.

II. COORDINATED CO-BRANDING AND MARKETING WILL MAXIMIZE THE IMPACT OF THE PROPOSED WATER APPLIANCE REBATE PROGRAM

We applaud the Commission's plan³ to provide a rebate for Energy Star clothes washers, as we feel these appliances offer the largest opportunity for indoor water and energy savings. The \$100 rebate, paired with PG&E and water agency rebates, will drive the market to replace equipment and deliver additional energy and water savings to the state.

With this additional rebate and messaging in the market, it is critical that the CEC work with PG&E and other utilities to ensure a consistent and streamlined customer experience. PG&E currently has a significant retail and online presence to promote clothes washers, and would like to partner with the CEC to co-brand our offerings to maximize limited retail floor space and ensure customers understand how to access both rebates. We have had early discussion with staff on this topic and look forward to continuing those conversations.

In addition to supporting the state's drought efforts through in-store co-branding, PG&E can further assist program efforts through our marketing channels such as the Energy-Smart Marketplace, newsletters and our website. We encourage the CEC to prepare resources to enable us, along with others, to promote this offering, which will preserve state financial resources for customer incentives. Furthermore, PG&E's customer service hotline supports 190 languages and provides communication materials and significant dedicated staff support for the languages most commonly spoken in California, including Spanish, Chinese, Tagalog, and Vietnamese.⁴ PG&E would be happy to explore options to extend in-language support of the Program through our customer service line.

III. THE PROPOSED WATER APPLIANCE DIRECT INSTALL PROGRAM SHOULD RESERVE FUNDING FOR REPAIRS

Experience from PG&E's many direct installation programs shows that toilets and faucets that may not need replacement can still benefit from efficiency-improving repairs. We encourage the CEC to reserve some funding to enable these low-cost water saving repairs where feasible.

³ Announced during the Staff Workshop on July 16, 2015. Retrieved from:
http://docketpublic.energy.ca.gov/PublicDocuments/15-WATER-03/TN205447-3_20150721T132659_Oakland_Powerpoint.pdf

⁴ PG&E Corporate Responsibility and Sustainability Report 2014, p. 80. Retrieved from:
http://www.pgecorp.com/corp_responsibility/reports/2014/PGE_CRSR_2014.pdf

IV. PG&E IS POSITIONED TO HELP IDENTIFY PARTICIPANTS FOR CEC/DWR EFFICIENCY PROGRAMS

The numerous direct installation programs PG&E offers allow an opportunity for identification of candidates and leads for the CEC's faucet and appliance replacement efforts as well as DWR's Toilet Replacement Program.

We commend the CEC and DWR on their rapid response to Governor Brown's executive order regarding California's drought, and we look forward to working with both agencies to identify the best process for connecting our customers with additional opportunities available through the state's programs.⁵

V. Conclusion

PG&E thanks the CEC for the opportunity to review and provide comment on the Water Appliance and Fixture Rebate Program. PG&E looks forward to continued collaboration with the CEC and DWR on this subject in the future.

Sincerely,

/s/

Valerie Winn

cc: J. Bastida by email (jack.bastida@energy.ca.gov)

⁵ Governor Brown Issues Executive Order to Redouble State Drought Actions. April 25, 2014. Retrieved from: <http://ca.gov/Drought/topstory/top-story-6.html>