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Additional submitted attachment is included below.



Spencer Olinek
Representative
State Agency Relations

77 Beale Street, B10C
San Francisco, CA 94105

(415) 973-5540
Spencer.Olinek@pge.com

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Re: Docket 17-IEPR-07: Pacific Gas and Electric Company Comments on the March 13, 2017 Integrated Energy Policy Report Webinar on Integrated Resource Planning

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to provide comments on the March 13, 2017 Integrated Energy Policy Report (IEPR) webinar on the California Energy Commission's (CEC) *Proposed Guideline Topics for Publicly Owned Utilities' Integrated Resource Plans* (issued February 2017) for ensuring all load-serving entities (LSE) comply with Senate Bill (SB) 350 (De León, Chapter 547, Statutes of 2015). Given PG&E's ongoing engagement with the California Public Utilities Commission (CPUC) on this matter in Rulemaking 16-02-007, PG&E appreciates the CEC's effort to develop guidelines for use by publicly owned utilities (POU) when preparing, adopting, and submitting integrated resource plans (IRP), and recognizes that ongoing coordination between the CEC, CPUC, California Air Resources Board (CARB), and the California Independent System Operator (CAISO) is critical to achieving the state's aggressive environmental goals with a fully integrated approach.

During the March 13, 2017 webinar, CEC staff reminded participants that SB 350 sets a statewide goal of reducing greenhouse gas emissions to 1990 levels by 2020 with ambitious targets for energy efficiency and renewable energy. The SB 350 statutes impose various regulations on CPUC-jurisdictional LSEs and CEC-jurisdictional POU to ensure consistent implementation of the requirements in a cost-effective manner. To ensure consistency across the agencies, and in turn, across the entities they regulate, PG&E recommends that CEC and CPUC Staff jointly author a whitepaper that (1) compares the differences in approaches to implementing the statutorily-mandated requirements and evaluates their differences, and (2) identifies any gaps in enforcing SB 350 requirements in the IRP planning processes and potential solutions for closing them. CPUC and CEC stakeholders would find immense value in this whitepaper and it would provide a strong foundation for discussing POU IRP guidelines at the CEC's May 25, 2017 workshop.

PG&E looks forward to continuing to work with the CEC and its sister agencies on this important effort throughout the 2017 IEPR process.

Sincerely,

/s/

Wm. Spencer Olinek

CC: Paul Douglas, Energy Division, CPUC