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PG&E Comments on Achieving Zero Emission Buildings

Additional submitted attachment is included below.

June 28, 2018

**POSTED ELECTRONICALLY TO
DOCKET 18-IEPR-09**

California Energy Commission
Dockets Office, MS-4
Docket No. 18-IEPR-09
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Docket 18-IEPR-09: Pacific Gas and Electric Company Comments on the 2018 Integrated Energy Policy Report Commissioner Workshop on Achieving Zero Emission Buildings

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to provide comments on the 2018 Integrated Energy Policy Report Commissioner Workshop on Achieving Zero Emission Buildings. PG&E has long supported the reduction of greenhouse gas (GHG) emissions and other short-lived climate pollutants (SLCPs) to achieve California's climate goals.

The workshop focused primarily on electrification as a means to reduce emissions from buildings' space and water heating from the combustion of natural gas. However, the discussion did not include efforts to decarbonize the natural gas stream through renewable and low-carbon gas alternatives. These alternatives could, if structured appropriately, present affordable alternatives for customers to reduce both GHG and SLCPs.

PG&E has been supportive of a renewable natural gas or low-carbon gas standard that includes price caps and cost allocation on a non-bypassable basis to provide the needed market signals and long-term certainty to bring RNG online at levels that can achieve the State's climate goals at prices that are affordable for customers. Successfully designing and implementing a procurement mandate such as an RGS will require careful consideration and thoughtful implementation and it should be considered as a path to achieving greater decarbonization of buildings.

PG&E appreciates this opportunity to comment and looks forward to continued participation in this IEPR process.

Sincerely,

/s/

Valerie J. Winn