

## DOCKETED

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<b>Project Title:</b>	General Rulemaking Proceeding for Developing Regulations, Guidelines and Policies for Implementing SB 350 and AB 802
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*Comment Received From: Pacific Gas & Electric*

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**Pacific Gas & Electric Comments re: SB 350 POU Proceeding**

*Additional submitted attachment is included below.*

May 18, 2016

**POSTED ELECTRONICALLY  
TO DOCKET 16-OIR-01**

California Energy Commission  
Dockets Office, MS-4  
Docket No. No. 16-OIR-01  
1516 Ninth Street  
Sacramento, CA 95814-5512

Re: Regulations, Guidelines and Policies for Implementing SB 350 and AB 802

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to provide comments on the California Energy Commission's (CEC) proceeding established to produce guidelines for and to review integrated resource plans (IRP) from local publicly owned electric utilities (POUs) as required by Senate Bill (SB) 350.

The CEC held a workshop on April 18, 2016 to hear from the POUs about their efforts and processes to comply with their SB 350 IRP requirements. During the workshop, the CEC did not offer specific plans to develop guidelines for the POUs to prepare, or a process for the CEC to review, the POU IRPs. In anticipation of the CEC developing these guidelines and processes, PG&E offers the following comments.

First, there is a need for close coordination and cooperation among the state agencies to achieve the state's goal, leveraging the on-going work of the California Air Resources Board (CARB), the CEC, and the California Public Utilities Commission (CPUC).

For example, PG&E anticipates that CARB's Scoping Plan Update will provide an indication of the potential contributions of different sectors and measures to achieve the 2030 greenhouse gas (GHG) target at different costs. These estimates can be used by the CPUC and the CEC to guide the development of the IRPs for load-serving entities (LSEs) in California.

PG&E also anticipates, based on the SB 350 requirements, that by November 1, 2017, the CEC will establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas final end uses of retail customers by January 1, 2030, to the extent feasible and cost-effective.<sup>1</sup> PG&E similarly expects that, based on those statewide annual targets, the POUs will establish annual targets for energy efficiency savings and demand reduction consistent with this goal.

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<sup>1</sup>Public Resources Code § 25310(c) (1)

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A great deal of coordination and consistency between state agencies is required in providing guidance for the development of the LSE IRPs that the agencies are responsible for reviewing or certifying. PG&E notes that more uniform oversight authority across California's energy agencies could better enable interagency coordination and consistency, and contribute to ensuring that all of the State's LSEs remain on track to help meet the state's GHG goals while continuing to provide safe, reliable and affordable service to customers. PG&E looks forward to continuing to work with the CEC on this important topic.

Sincerely,

/s/

Nathan Bengtsson