

## DOCKETED

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**Pacific Gas and Electric Company Comments on Draft Staff Papers Regarding 2030 Energy Efficiency Doubling Targets**

*Additional submitted attachment is included below.*

August 3, 2017

**POSTED ELECTRONICALLY TO  
DOCKET 17-IEPR-06**California Energy Commission  
Dockets Office, MS-4  
Docket No. 17-IEPR-06  
1516 Ninth Street  
Sacramento, CA 95814-5512Re: Docket 17-IEPR-06: Pacific Gas and Electric Company Comments on Draft Staff Papers Regarding 2030 Energy Efficiency Doubling Targets

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to provide comments on the California Energy Commission (CEC) staff papers, *Senate Bill 350 Energy Efficiency Target Setting for Utility Programs* and *Senate Bill 350 Energy Efficiency Targets for Programs Not Funded through Utility Rates* (Staff Draft Papers) and their methodology and targets for 2030 energy efficiency. PG&E provides comments including the following key point in response to the Staff Draft Papers:

- Load Serving Entities Should Only be Subject to One Set of Rules and Requirements

PG&E looks forward to continuing to work with staff on this important effort until the adoption of 2030 energy efficiency targets in the fall of 2017.

**I. Load Serving Entities Should Only be Subject to One Set of Rules and Requirements When Demonstrating Fuel Substitution Eligibility**

In response to the question posed on page 47 of the Utility Programs paper, “[s]hould a utility wishing to demonstrate that a fuel-substitution program satisfies SB 350 criteria be required to use a broad, California wide electric generating system or a narrow utility-specific resource analysis of expected electric generation GHG emissions?” PG&E recommends that the California Public Utilities Commission (CPUC)-jurisdictional LSEs be subject to the rules and requirements of the CPUC for fuel substitution programs, including modeling requirements. Otherwise, these entities could be subject to two different sets of rules for demonstrating fuel substitution eligibility. Additionally, to avoid further confusion, PG&E recommends that the CPUC and CEC coordinate on requirements for fuel substitution technologies. As LSEs work toward 2030 energy efficiency targets, it is important that they are not subject to different sets of requirements.

**II. Conclusion**

PG&E appreciates this opportunity to comment on the Draft Staff Papers for 2030 energy efficiency targets and looks forward to continued participation in this process.

Sincerely,

/s/

Wm. Spencer Olinek