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California Energy Commission

Research and Development Division - Electric Program Investment Charge (EPIC) Program
1516 9th Street
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Re: Pacific Gas and Electric Company Comments in Response to the California Energy Commission's EPIC Interim Investment Plan Staff Workshop (Docket No 20-EPIC-01)

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to provide comments to the California Energy Commission (CEC) on the workshop on January 6, 2021, that discussed preliminary research themes and initiatives for the Electric Program Investment Charge (EPIC) Interim Investment Plan (the Plan) for 2021 to 2022. PG&E supports the Plan's research themes, including resilience, reliability, and decarbonization, as well as the plan's approach to equity.

PG&E provides the following comments, focused on three initiatives outlined in the plan. Initiative 1 to Advance Prefabricated Zero-Carbon Homes; Initiative 3 on Energy Efficiency and Load Shifting in Indoor Farms; and Initiative 7 on Vehicle-to-Building Technologies for Resilient Back-up Power.

1. Advanced Prefabricated Zero-Carbon Homes

- Given that the 2022 Title 24 code will be adopted in July 2021, PG&E recommends using the 2022 code for target-setting and to help prefabricated home builders to adopt future methods.
- PG&E suggests that the CEC consider indoor air quality measures.
- PG&E recommends that the CEC consider CALGreen topics such as the water/energy measures and embodied carbon.

3. Energy Efficiency and Load Shifting in Indoor Farms

- For new buildings, consider the upcoming 2022 Title 24 code as the target for the Controlled Environment Horticulture spaces.

7. Vehicle-to-Building Technologies for Resilient Back-up Power

Given PG&E's fire-prevention Public Safety Power Shutoffs, we strongly support this initiative's focus on a VGI resiliency use-case. We recommend considering cybersecurity to be part of this initiative as it is essential to ensure customer safety while using highly digitalized systems. We recommend consideration of the following in establishing metrics and performance indicators:

- Load profiles of the homes and buildings utilizing zero-emission, vehicle-provided back-up power during grid outages;
- Estimated Greenhouse Gas (GHG) reductions and, to the extent practical, estimated air pollution reductions using emission factors developed by the California Air Resources Board and other relevant data;
- Include geospatial data in addition to the number of homes, buildings and individuals with access to zero-emission, vehicle-provided back-up power during grid outages; and
- Provide cost-effectiveness analysis and include detailed software, hardware, and integration-related costs to provide actionable insight for the lower-cost objectives.

PG&E continue to support the public investments in research to create and advance new clean energy solutions, foster regional innovation, and bring ideas from the lab to the marketplace. We appreciate the opportunity to comment on the EPIC Interim Investment Plan for the year 2021 to 2022 to continue investing in clean energy research. Please do not hesitate to contact me if you have any questions.

Sincerely,

Licha Lopez