



**Pacific Gas and
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June 11, 2007

California Energy Commission
1516 Ninth Street
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|------------------|--------------------|
| DOCKET | |
| 06-NSHP-1 | |
| DATE | JUN 11 2007 |
| RECD | JUN 20 2007 |

Electronic Delivery

Re: Docket # 06-NSHP-1 (**Proposed changes to the New Solar Homes Partnership Guidebook**)

Docket Office:

Please find attached PG&E's comments on the workshop held June 6, 2007, regarding "**Proposed changes to the New Solar Homes Partnership Guidebook**".

Please contact me should you have any questions. I can be reached at 415/973-6463.

Sincerely,


Les Guliassi */mld*

Attachment



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Re: Docket No. 06-NSHP-1 (Comments on CEC-Proposed Guidebook of June 6, 2007)

Commissioner John Geesman, Presiding Member – Renewables Committee
Chairman Jackalyne Pfannenstiel, Associate Member – Renewables Committee

PG&E would like to thank the Commission for the opportunity to submit comments on the proposed changes to the New Solar Homes Partnership Guidebook discussed at the Renewables Committee Workshop on “Proposed Changes to the New Solar Homes Partnership Guidebook,” held on June 6, 2007.

PG&E concurs with the proposed edits that define the energy efficiency requirements and encourage builders to participate in the utility Residential New Construction energy efficiency (EE) program that includes rebates for tiers that are aligned with the CEC's NSHP energy efficiency requirements. Accepting documentation of participation in the IOU's Residential New Construction program as satisfying the NSHP EE requirements is beneficial in that the builder will not have to submit duplicate documentation to the utility and the CEC, and will therefore encourage participation in the EE and NSHP programs.

PG&E requests that the Commission modify the following section:

(Page 29) Affordable housing section

This section lays out the reservation process for participation for affordable housing and mixed use properties. It is unclear if energy efficiency requirements (Tier 1 or Tier 2) are requirements for affordable housing and mixed use. PG&E recommends including the clause in that section, referring to the EE requirements spelled out in the earlier parts of the guidebook on page 9, apply to all NSHP participation.

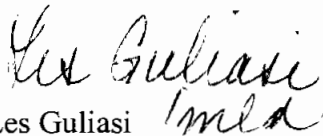
Having the mixed use properties under the affordable housing section implies that mixed use properties that are not affordable housing get the incentive levels that apply to affordable housing (these are higher than the base incentives). PG&E seeks clarification as to whether or not higher incentives apply to mixed use and affordable housing or just to affordable housing.

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Inclusion of common areas in multi-family affordable housing and mixed use properties that serve the residential portion is permissible under the NSHP. PG&E also seeks clarification on how common areas are going to be determined; specifically, will common areas be determined on residential rates or commercial rates.

The revised Guidebook now includes mixed use projects (commercial and residential). In order to encourage mixed use buildings to participate in both NSHP (for new residential) and CSI (for new commercial) the CEC should work with the CPUC to develop a single application that addresses all of these types of projects.

Sincerely,


Les Guliasi

cc: Payam Narvand, California Energy Commission
Sandy Miller, California Energy Commission
Bill Pennington, California Energy Commission