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**Date:** 1/30/2008 2:43 PM  
**Subject:** Docket Number 07-AAER-3 - PG&E Submittal Letter  
**Attachments:** PGE\_Summary Comments for Jan 30 filings to CEC.pdf

Melinda and Harrinder,

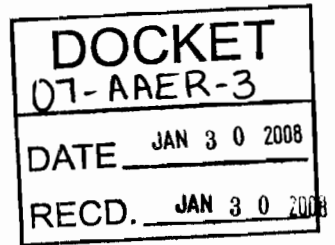
Attached, please find a submittal letter that summarizes the various PG&E CASE Reports and CASE Templates PG&E will be submitting for the January 30th documentation request for the new Title 20 docket. Over the rest of the day, I'll be forwarding individual CASE Reports and CASE Templates as they become available for submittal. As we indicate in the attached letter, we continue to work on finalizing CASE Reports to back up the CASE Templates we send today.

Please let me know if you have any questions about any of the materials being submitted.

We hope that this documentation helps the Commission select an aggressive schedule for pursuing much of the very large aggregate savings opportunities identified by PG&E, SCE, Sempra, NRDC and other stakeholders. Please let us know how we can be of assistance as the process moves forward!

<<PGE\_Summary Comments for Jan 30 filings to CEC.pdf>>

Regards,  
Patrick Eilert



**Overview of Standards Proposal Templates and CASE Reports**  
**Prepared by the Pacific Gas and Electric Company**  
Codes and Standards Program  
For Title 20, 2008 Proceeding  
Docket # 07-AAER-3

Prepared for:

Jackalyne Pfannenstiel,  
Chairman and Presiding Member

Arthur Rosenfeld  
Commissioner and Associate Member

Energy Efficiency Committee  
California Energy Commission

Prepared by:

Pat Eilert



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**Overview of Standards Proposal Templates and CASE Reports**  
**Prepared by the Pacific Gas and Electric Company**  
**Codes and Standards Program**  
**For Title 20, 2008 Proceeding**  
**Docket # 07-AAER-3**

The Pacific Gas and Electric Company (PG&E) Codes and Standards Enhancement (CASE) Initiative Project seeks to address energy efficiency opportunities through development of new and updated Title 20 standards. The objective of this project is to develop CASE Reports that provide comprehensive technical, economic, market, and infrastructure information on each of the potential appliance standards. As part of the January 15, 2007 scoping workshop conducted by the California Energy Commission (Commission) Energy Efficiency Committee, stakeholders were directed to submit thorough documentation supporting any standards options being proposed. While PG&E has not completed all CASE Reports that it is currently developing for this new Title 20 proceeding, we are submitting those CASE Reports that are complete as well as short form CASE templates, where the CASE Report could not be completed by today.

We appreciate this opportunity to provide this input to the Commission as it contemplates its plan for staging the pursuit of its selected standards opportunities. As was noted in the PG&E presentation on January 15<sup>th</sup>, we believe that there are very significant savings opportunities that the Commission can and should pursue under the new Title 20 docket. Based on our preliminary estimates, the opportunity appears to be larger than the savings achieved in the 2004 Title 20 adoptions. We estimate a total potential savings at complete appliance stock turn over to be approximately 9,000GWh--3 percent of current California gross system power--not including items that are likely to be preempted by the federal government.

In our presentation at the January 15, 2008 scoping workshop for this docket, we identified twenty-four (24) standards proposals for Commission consideration. In response to the Commission's request for documented standards proposals by January 30, 2007, we will be delivering fourteen (14) PG&E CASE reports or CASE templates for what we believe to be the higher priority projects that we recommend that the Commission pursue in 2008 (Table 1). We have limited our submittal to all those standards proposals that we have identified as the "Highest Priority" with three additional lighting related standards from other priority categories. (Please see Figure 1 for the most update and complete ranking list of the 24 standards proposals).

**Table 1: List of CASE Reports and CASE Templates To Be Submitted by PG&E**

<b>PG&amp;E Standards Proposals</b>	<b>Priority</b>	<b>Estimated Savings Impacts After Stock Turnover (GWh)</b>
General purpose lighting	Highest	tbd
Batter chargers	Highest	2,303
Linear fluorescent fixtures	Highest	1,959
Televisions	Highest	1,660
Set-top boxes	Highest	1,072
Video display equipment	Highest	968
Portable lighting Fixtures	Highest	871
Decorative string lights	Highest	649
Plug-in luminous signs	Highest	585
Metal halide lamps	Highest	583
Pool and spa standards refinements	Highest	NA
Signage power supplies	High	500
Nightlights	High	111
Illuminated street number signs	Medium	73
<i>Fluorescent tube lamps (federal level) *</i>	<i>NA</i>	<i>3,350</i>

\* Please note that we have submitted a document regarding Linear Fluorescent Tube Lamp standards which are preempted and subject to a current DOE proceeding. Because of the contribution that this particular DOE standard could make to meeting AB1109 commercial lighting goals, we encourage the CEC to participate in that federal proceeding.

As we have indicated to the Commission, the PG&E team did not have sufficient resources to complete the CASE Reports or CEC templates for all 24 of its proposals by January 30, though the team has been conducting the research and analysis in support of these standards opportunities over the last year and is well positioned to engage in the rulemaking process for all proposals this year. We will continue to complete the comprehensive CASE Reports for all of our proposed standards and will submit them as soon as they are complete. We appreciate any guidance the Commission can provide in terms of its highest priority standards opportunities. We will then prioritize completion of full CASE Reports for those proposals selected by the Commission for early treatment in this docket.

PG&E stands ready to assist the Commission in any way possible with the prosecution of the standards opportunities in this docket. Please do not hesitate to contact us with any questions regarding this letter or any of the submitted draft CASE Reports or CEC templates

**Figure 1: PG&E Proposed Title 20 Priority Ranking**

<b>HIGHEST PRIORITY</b>	<ul style="list-style-type: none"> <li>General Purpose Lighting</li> <li>Battery Chargers, 2,030</li> <li>Linear Fluor. Fixtures, 1,959</li> <li>Televisions, 1,660</li> <li>Set-Top Boxes, 1,072</li> <li>Video display equipment, 968</li> <li>Portable Lighting Fixtures, 871</li> <li>Decorative String Lighting, 649</li> <li>Plug-in Luminous Signs, 585</li> <li>Metal Halide Lamps, 583</li> <li>Pool/Spa refinements</li> </ul>	<p><u>Support Federal Action</u></p> <ul style="list-style-type: none"> <li>Fluor. Tube Lamps, 3,350</li> <li>Res. refrigerators, 1,680</li> <li>Prem. Efficiency Motors, 769</li> </ul>
<b>HIGH PRIORITY</b>	<ul style="list-style-type: none"> <li>Game Consoles, 2,275</li> <li>Signage power supply, 341</li> <li>Vented Gas Fireplaces, 276</li> <li>Microwave Ovens, 200</li> <li>Garage door openers, 159</li> <li>Nightlights, 111</li> </ul>	<p>NOTES: Values after topic name are current energy saving estimates (GWh/yr) for each topic at full replacement (value for vented gas fireplaces is straight GWH equivalents from 9 MMTherms.) Topics without values are TBD upon further research.</p> <p><b>CIRCLE COLOR KEY:</b></p> <ul style="list-style-type: none"> <li>topic related to AB 1109 (Huffman)</li> <li>may be related to AB 1109 (Huffman)</li> <li>all other topics</li> </ul>
<b>MEDIUM PRIORITY</b>	<ul style="list-style-type: none"> <li>Residential Air-Handlers</li> <li>Illum. st. number signs, 73</li> <li>Circulation Pumping, 56</li> <li>Shelf lighting systems, 54</li> <li>Dimming Ballasts</li> <li>Photocontrols</li> <li>Comm. Kitchen Vent.</li> </ul>	
<b>No further action at this time</b>	<ul style="list-style-type: none"> <li>Modular furniture sensors</li> <li>Doorbell transformers</li> </ul>	