



**Pacific Gas and  
Electric Company\***

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California Energy Commission  
1516 Ninth Street, MS - 4  
Sacramento, CA 95814

<b>DOCKET</b>	
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<b>DATE</b>	MAR 14 2008
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Dear Dockets Office,

Pacific Gas and Electric Company respectfully submits the following comments in response to issues raised in the CEC's workshop of March 3, 2008 for its Load Management OII/OIR, docket #08-DR-01.

Thank you for considering our comments. Please feel free to call me at (415) 973-4185 if you have any questions about this matter.

Sincerely,

Kathy Treleven

Attachment

Comments of Pacific Gas and Electric Company  
Regarding the March 3, 2008 CEC workshop on Load Management  
Docket 08-DR-01  
March 14, 2008

Pacific Gas and Electric Company (PG&E) submits its post-workshop comments on two topics that arose at the March 3, 2008 workshop in this docket. PG&E appreciates the opportunity to provide these brief comments to clarify discussion about its preference for implementation of dynamic pricing options for its customers and to report on the status of OpenHAN standards currently under development.

Dynamic Pricing

PG&E unequivocally supports opt-in dynamic pricing rate alternatives for all its customer classes. We believe strongly in customer choice and maintain that customers should express that choice through opt-in elections that demonstrate they have affirmatively chosen to go on a dynamic pricing rate alternative. Customers who make that affirmative choice will be much better positioned to understand how the dynamic pricing alternative they select works and what they need to do in response. In order to win customer acceptance of dynamic pricing and to obtain actual demand reductions, PG&E strongly supports voluntary, opt-in dynamic pricing and demand response programs.

Communication Architecture (OpenHAN)

As the CEC investigates setting demand response standards, it will be important for it to have a good understanding of the evolving structure of the devices that allow customers to interact with their gas and electric utilities. PG&E encourages the CEC to review and to be more closely involved in the extensive work that has been done in this area by a joint utility working group.

In May 2006, the OpenHAN task force was developed. OpenHAN is a task force of the UtilityAMI working group operated under the auspices of the Utility Communications Architecture International Users Group (UCAIug). OpenHAN is charged with addressing issues related to the utility/consumer interface which is one of several tasks of the UtilityAMI work plan. Specifically, OpenHAN is developing use cases, requirements, high level architecture, and security policy to support utility applications that utilize a Home Area Network (HAN) established and/or accessed through utility owned equipment such as a meter or poletop gateway (also referred to in the industry as a utility/ consumer portal). The task force consists of utilities throughout the world as voting members, and also has considerable vendor participation. The task force previously has invited both members of the CEC and CPUC to actively participate in the task force and development of requirements. We have seen some involvement from regulators and their contractors. Future increased participation in meetings and decisions by regulatory bodies would be welcome.

As of now the OpenHAN task force has developed use cases and guiding principles. The group has recently ratified version 1.0 of the Home Area Network System Requirements Specifications. These requirements will be released soon to device providers as guidelines to develop products. For now, a draft version of the Home Area Network System Requirements Specifications can be accessed at: <http://sharepoint.ucausersgroup.org/OpenHAN/Shared%20Documents/Forms/AllItems.aspx>

PG&E appreciates the opportunity to comment in this proceeding and looks forward to continued participation in this load management investigation.