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Bernie Orozco  
Director  
State Governmental Affairs

Ph. (916) 492-4244  
Fax (916) 443-2994  
borozco@sempra.com

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California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814-5512

**Re: Docket No. 08-IEP-1 Scope of 2009 Integrated Energy Policy Report**

Dear Commissioners:

San Diego Gas & Electric Company (SDG&E) appreciates the opportunity to offer these comments on the scope of the California Energy Commission's (CEC) 2009 Integrated Energy Policy Report (2009 IEPR). Lack of comment on any particular topic should not be perceived as a lack of interest. Additionally, SDG&E intends to fully participate in the 2009 IEPR workshops.

**I. The focus of the 2009 IEPR should be refined to concentrate on fewer key issues.**

SDG&E respectfully suggests that the 2009 IEPR should focus on a limited number of topics, rather than attempting to cover a large number of topics at a more general level of detail. SDG&E agrees with the comments of Commissioner Pfannenstiel on the need to exercise restraint and narrow the focus of the 2009 IEPR on policy issues that are most critical to the State, with a clear method of how to address tackling those issues. This should facilitate a more thorough treatment of the key policy issues. Additionally, by focusing on the most relevant statewide policy issues, as opposed to narrow or entity-specific issues, the final report will be a more complete and generally applicable policy report.

**II. Participants should be afforded adequate time to respond to CEC reports.**

In years past, the CEC issued numerous reports focusing on numerous different and very diverse topics. Generally, these reports were helpful in facilitating SDG&E's participation in the IEPR process and provided focus and structure to the workshops that followed. However, on occasion, the first time stakeholders even knew the IEPR was studying an area was when a report was released. Thus, SDG&E recommends that the CEC release an entire list of all the planned studies and projected workshop dates earlier in the process. Moreover, given the relatively quick turnaround times for feedback, there were instances when SDG&E simply needed more time to fully digest and analyze the report's content. If the CEC is seeking thorough feedback, parties should be provided the time to do such work. Accordingly, SDG&E respectfully requests that workshop participants be allowed additional time to respond, where necessary. For example, some reports can be analyzed within two weeks, but others (especially those including more complex information and evaluations) may require additional time. Where there is a need to engage more deeply into a specific issue, all parties should have ample opportunity to comment.

### **III. Efforts should be made to avoid duplicating effort.**

Clearly, when undertaking the task of creating a statewide policy report such as the 2009 IEPR, prudence requires making an effort, whenever possible, to make use of analysis and data generated by other proceedings, including other CEC and California Public Utilities Commission proceedings. Doing so will avoid the proverbial need to “re-create the wheel” and allow workshop participants to focus on how to make the information developed in other proceedings most useful in this proceeding, resulting in the most relevant and current 2009 IEPR possible.

Yours sincerely,

*Bernie Orozco*