



**Pacific Gas and
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ELECTRONIC DELIVERY

California Energy Commission
Docket Office, MS-4
Attn: Docket No. 08-DR-01
1516 Ninth Street
Sacramento, CA 95814

DOCKET	
08-DR-1	
DATE	JUN 25 2008
RECD.	JUN 25 2008


Re: Docket # 08-DR-01 (Workshop on Load Management)

Docket Office:

Attached are PG&E's comments for the above workshop held June 19, 2008.

Please contact me should you have any questions.

Sincerely,



Dan Kim

Attachments

Comments of Pacific Gas and Electric Company
Regarding the June 19, 2008 CEC Workshop on Enabling Technologies
Docket 08-DR-01
June 25, 2008

Pacific Gas & Electric Company (PG&E) appreciates the opportunity to participate in the June 19, 2008, California Energy Commission (CEC) workshop on load management (Docket #08-DR-01). The issue of how to control and adjust load through technology and rate design is an important topic and one that PG&E is engaged with regulators, vendors and customers in addressing.

For the record, we must correct one comment that was made at the workshop. The statement that was made was on the issue of the Zigbee protocol and how we believed it was “mandated by the Australian government”. We erred in saying that it was mandated; we should have instead clarified that “the Zigbee protocol is currently stated as a requirement in the Victorian Department of Industries, Minimum AMI Functionality Specification, dated October 2007”.

The subject of this workshop - “Enabling Technologies” – includes the development of home area networks (HAN) and is a key component of future load management. PG&E believes that the functionality of HAN is enhanced through communication via a two-way link from the utility and the customer.

This two-way link will allow utilities to identify outages through interval data and allow for measurement of customer participation in programs. Other customer benefits will include in-home displays, showing how they can control their load, and allowing customer installation and customization.

Furthermore, current and future potential HAN applications will allow shifting, shaping and limiting of load, as well as working with more traditional Air Conditioner (AC) cycling programs. Future features will include plug-in-electric-vehicle (PHEV) smart charging and customer storage controls.

As was discussed in the workshop, PG&E believes that any HAN protocols will need to embrace open architecture, interoperability, future flexibility and scale economics. There must be large market opportunity with standardized, interoperable products to help develop this market. Regulators should avoid “feature creep” or hedging strategies that have the potential to add costs, confuse manufacturers and introduce delay as manufacturers will be tempted to “wait it out” until a clear market and specifications emerge.

Another major focus in the workshop was the Auto Demand Response (DR) technology developed by the Demand Response Research Center (DRRC) at the Lawrence Berkeley National Laboratory (LBNL). PG&E fully supports this technology and has proposed to expand the Auto DR Program in the 09-11 DR portfolio. Automation of DR will enable us to execute our DR strategies - making it more consistent, predictable and reducing labor costs. PG&E will build on its 2007-2008 success and continue to work with the DRRC to expand the Auto DR program. DR automation is essential to long-term success of PG&E's DR portfolios by increasing program reliability and consistency.

In conclusion, PG&E is committed to working with the regulators on the issue of load management. We are appreciative of the opportunity to participate in the workshop and to provide these comments.