

Valerie J. Winn
Manager
State Agency Relations

77 Beale Street, B10C
San Francisco, CA 94105

(415) 973-3839
(415) 973-7226 Fax
vjlw3@pge.com

June 14, 2012

DOCKET	
12-AB1103-1	
DATE	June14 2012
RECD.	June15 2012

California Energy Commission
Dockets Office, MS-4
Re: Docket Number 12-AB1103-1
1516 Ninth Street
Sacramento, CA 95814-5512

VIA E-MAIL
DOCKET@ENERGY.CA.GOV

Re: AB 1103 -- Comments on Draft Regulation to Implement the Nonresidential Building
Energy Disclosure Program

Pacific Gas and Electric Company ("PG&E") welcomes the opportunity to provide additional comments on the California Energy Commission's ("CEC") draft regulation to implement the Nonresidential Building Energy Disclosure Program ("Program").

PG&E respectfully requests one modification to Section 1685(b) of the proposed regulation to ensure that sufficient time is provided to parties to comply with provisions of the Program. Specifically, Section 1685 outlines the process and timeline for complying with requests to upload energy use data for a building. In particular, the process requires that parties "take action(s) to reasonably protect the confidentiality of the data" and to "verify a request or ask for clarification." However, the draft regulation currently provides only 15 days in which to validate or clarify requests and upload the energy use data. This limited time period, which includes weekends and holidays, does not provide sufficient time to perform these functions. PG&E asks that 30 days be provided to achieve compliance with this provision. This is a reasonable period that will accommodate numerous challenges that may arise during this process and allow parties a reasonable time period to complete the process without fear of non-compliance.

With this modification, Section 1685(b) would read, "Within 30 days of receiving a request under subdivision (a) of this section, a utility or energy provider shall upload all energy use data for the entire building from at least the most recent 12 months for the specified meters or accounts to the building owner's Portfolio Manager Account."

PG&E appreciates the CEC's attention to this issue. Should you have any questions about the requested modification, please do not hesitate to contact me.

Sincerely,

/s/

Valerie J. Winn

cc: J. Regnier via email (jregnier@energy.ca.gov)
R. Mayer via email (robin.mayer@energy.ca.gov)