

May 10, 2013

California Energy Commission  
Dockets Office, MS-4  
1516 Ninth Street  
Sacramento, CA 95814-5512  
Submitted by email to: [docket@energy.ca.gov](mailto:docket@energy.ca.gov)



Re: Invitation to Participate in the Development of Appliance Efficiency Measures  
General comments for Docket 12-AAER (2A, 2B, 2C, 2D, 2E, 2F, 2G)

Dear Commissioners,

National Grid supports the California Energy Commission Order Instituting Rulemaking approved on March 14, 2012 and submits these general comments in response to the Invitation to Participate (ITP) issued on March 20, 2013.

National Grid is an investor owned utility serving gas and electric customers in 3 northeastern states. We have been administering energy efficiency programs for more than twenty-five years in the states we serve; Massachusetts, Rhode Island and (more recently) New York State. Through our efficiency programs, we have promoted and have been part of transforming the market to use higher efficiency equipment and appliances. We support the development of efficiency standards to achieve energy and economic savings while maintaining or increasing consumer utility of the products and appliances covered.

We support and recognize California's important role in this process. California, which has historically taken on the pioneering work of drafting and adopting state appliance efficiency standards, test procedures, marking and labeling requirements, and other efficiency measures, has another important opportunity on the table now. With this rulemaking, California can further cement its leadership role in the development and adoption of groundbreaking efficiency standards. CEC standards, test procedures, and other efficiency measures have often formed the basis for national standards and have led to enormous energy, cost, and CO<sub>2</sub> savings in California and in the U.S. The current rulemaking has tremendous savings potential, both for the state and for the nation and we urge you to fully consider each of the sixteen products included in Phase 1 of the rulemaking. This rulemaking will help us advocate these products in our regions of New England and New York State.

We support the full range of products identified in the Invitation to Participate and urge the CEC to take advantage of this historic opportunity to further lower energy use in California and the country. We would like to reiterate our support to help limit the growth of energy consumption by products and equipment statewide while saving consumers' money and stimulating product innovation. We hope the State of California will approve this rulemaking.

We look forward to continue working closely with California and national stakeholders to establish cost effective energy conservation standards for products and appliances.  
Thank you for considering our comments.

Sincerely,

A handwritten signature in cursive script that reads "Thomas J. Coughlin, Jr." The signature is written in black ink and is positioned above the typed name.

Thomas J. Coughlin, Jr.  
Manager, Technical Strategy & Policy

cc Puja Vohra, National Grid (via e-mail)