



March 7, 2014

California Energy Commission
Docket No. 12-AAER-1
Docket Unit
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512

Docket Number: 12-AAER-1

RE: Appliance Efficiency Regulations: Joint Comments of California Investor Owned Utilities on Appliance Efficiency Enforcement Regulations

Dear Commission:

This letter comprises the comments of the Pacific Gas and Electric Company (PG&E) and San Diego Gas and Electric (SDG&E) in response to the California Energy Commission's (CEC) draft Appliance Efficiency Enforcement Regulations.

The signatories to this letter represent some of the largest utility companies in the Western United States, serving millions of customers. As energy companies, we understand the potential of appliance efficiency standards to cut costs and reduce consumption while maintaining or increasing consumer utility of the products. We have a responsibility to our customers to advocate for standards that accurately reflect the climate and conditions of our respective service areas, so as to maximize these positive effects.

We appreciate this opportunity to provide the following comments about the Appliance Efficiency Enforcement Rulemaking draft language, which reflect those provided in-person at the Staff Workshop on February 25th, 2014:

1. Compliance verification for circumstances when contractors are vendors

In developing language, CEC should consider situations where the vendor may be a contractor, rather than the traditional wholesaler or retailer. For example, this situation occurs with swimming pool pumps and motors, where contractor-vendors may be the only ones knowing if products are being utilized in residential filtration applications, and in the future when regional federal standards feature specialized requirements for hot-dry states, including California. To ensure compliance, we recommend a verification mechanism that addresses installed equipment that otherwise may not lend itself to a building inspection or other audit.

2. Date of manufacture

Since compliance is contingent upon the date of manufacture being located on products, as DOE and Title 20 Standards are applicable to "Products manufactured after a stated calendar date", we encourage CEC to develop language to further articulate and enforce the date of manufacture requirement outlined in the

Warren Alquist-Act, section 25402(c)(2). Currently, for many products it's very difficult, if not impossible to determine this by looking at the physical product and/or product packaging.

3. Outreach and education programs

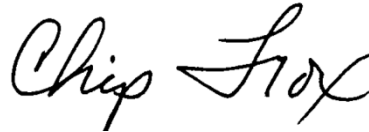
We encourage CEC to further develop its outreach and education program to those subject to the compliance, and welcome collaboration and coordination with PG&E and SDG&E and our existing efforts, e.g., identifying low hanging-fruit where education can improve compliance and implementing, including providing education and training for pool pump contractors about what is required in the standard, and how to optimize installation to maximize energy savings.

In conclusion, we would like to reiterate our support for statewide compliance with California's Appliance Efficiency Regulations. We thank CEC for the opportunity to be involved in this process and encourage CEC to carefully consider the recommendations outlined in this letter.

Sincerely,



Patrick Eilert
Principal, Codes and Standards
Pacific Gas and Electric Company



Chip Fox
Residential Programs and Codes & Standards
Manager
San Diego Gas and Electric Company