

From: Ramaiya, Shilpa R  
Sent: 6/9/2010 1:28:51 PM  
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Subject: OBF Reporting

Jennifer, (Simon)

Thanks for being efficient with your questions in the call this morning. I'm glad to hear that Energy Division plans to approve the advice letter before July 1 so the program launch can continue as Energy Division previously ordered. With 3 weeks left, there isn't room to press the 'stop' button this train.

As discussed this morning, I promised to follow-up on the one new, additional request you had: reporting for OBF. Reda and I have discussed and believe that having a telephone call with Energy Division once a quarter (through Q3 2011) reviewing our past and upcoming launch milestones (written in a document) adequately meets DRA's requested need that Energy Division ensure the "OBF program will meet an on-time start date" of Q3 2011. (quoted from DRA protest). This also allows you to ask questions in real-time of program developments to ensure timeliness.

We believe any additional reporting does not align with the CPUC's decision language that "The Commission must do its part to minimize the regulatory burden on the utilities and have made every effort in this decision to require only necessary filings and reports [no reports were required for OBF roll-out]. We request that the Energy Division review further all existing and new energy efficiency reporting requirements and report on possible ways to streamline these requirements" (2010-12 decision, p.64).

Moreover, if the reporting intent is to ensure that the program is running smoothly and examine market demand, we should have a joint IOU meeting/request so that the IOUs can learn from each other while the Energy Division tracks efforts. Singling out PG&E for a market demand report and analysis would not be appropriate given that all IOUs are running a statewide program.

I believe our proposal for a quarterly conference call (with written milestone information to reference) is reasonable and adequate, and allows you to ask real-time questions to ensure the launch is on track.

We are happy to discuss in a follow-up call, if you believe it is necessary.

Thanks.  
Shilpa

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