

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Examine the
Commission's Post-2008 Energy Efficiency
Policies, Programs, Evaluation, Measurement,
and Verification, and Related Issues Order

Rulemaking 09-11-014
(Filed November 20, 2009)

**COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M)
ON ASSIGNED COMMISSIONER RULING ON
DRAFT STRATEGIC LIGHTING PLAN**

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July 16, 2010

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**I.
INTRODUCTION**

Pursuant to the June 25, 2010, *Assigned Commissioner's Ruling on Draft Strategic Lighting Plan* ("ACR"), San Diego Gas & Electric Company ("SDG&E") respectfully submits its comments on the draft Energy Division lighting chapter to be included in the California Long-Term Energy Efficiency Strategic Plan ("Plan").

SDG&E actively participated in the numerous collaborative meetings that were held seeking input for the purposes of developing the draft lighting plan ("Draft"). Overall, SDG&E supports the vision, goals, strategies and milestones for lighting as articulated in the Draft. The Draft appropriately recognizes that it is essential for industry leaders to continue their involvement past the development of the goals and strategies to help implement the actions needed into the future. SDG&E offers the following comments regarding additional work it believes needs to be undertaken to be able to bring the Draft's vision to fruition.

**II.
ADDITIONAL WORK IS NECESSARY TO FURTHER ENHANCE THE
POTENTIAL FOR ACHIEVING THE LIGHTING GOALS ON A GOING-
FORWARD BASIS**

Page 2 of the Draft indicates that lighting comprises approximately one-fourth of California's electricity use and the goal is to achieve a 60-80% reduction in statewide lighting consumption. SDG&E believes that this represents an aggressive and laudable goal and will work with manufacturers, retailers, customers, other stakeholders to meet the goal. Critical

success factors in achieving this goal are effective outreach campaigns that engage all customer segments in the effort and the development of aggressive codes and standards that mandate advanced lighting technologies very early in their commercialization cycle.

The Draft presents overarching strategies which focus to a greater extent on non-residential applications to achieve market transformation and reduced energy consumption and a lesser degree on residential. SDG&E, however, believes that continuing efforts to develop strategies aimed at the residential retrofit market are also needed. It is essential that market transformation be focused on all market segments if we expect to achieve 60-80% reduction in statewide electrical lighting energy consumption. SDG&E suggests that the development of strategies to attain the goal be multi-faceted and include education and awareness campaigns, aggressive product incentives, and a robust technology development/commercialization effort to ensure a wide array of high efficiency lighting products.

III. CONCLUSION

In conclusion, SDG&E appreciates the opportunity to comment on the draft strategic lighting plan.

Dated: July 16, 2010

Respectfully submitted

By /s/ Steven D. Patrick
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing **COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M) ON ASSIGNED COMMISSIONER RULING ON DRAFT STRATEGIC LIGHTING PLAN** on all parties of record in **R.09-11-014** by electronic mail and by U.S. mail to those parties who have not provided an electronic address to the Commission.

Copies were also sent via Federal Express to Administrative Law Judge Darwin Farrar, and Commissioner Dian Grueneich.

Dated at Los Angeles, California, this 16th day of July, 2010.

/s/ Marivel Munoz

Marivel Munoz

CALIFORNIA PUBLIC UTILITIES COMMISSION
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