

**PACIFIC GAS AND ELECTRIC COMPANY
Energy Efficiency OIR Post-2008
Rulemaking 09-11-014
Data Response**

PG&E Data Request No.:	ED_014-01 (EEGA 1344)		
PG&E File Name:	EnergyEfficiencyOIR-Post-2008_DR_ED_014-Q01_EEGA 1344		
Request Date:	July 30, 2010	Requester DR No.:	EEGA 1344
Date Sent:	August 3, 2010	Requesting Party:	ED
PG&E Program Lead:	Redacted	Requester:	Cathy Fogel

Subject: REQUEST FOR INFORMATION ON CONTRACTOR USE OF MID-UPSTREAM DISTRIBUTION CHANNELS OF REBATED LOW FLOW/LOW FLOW THERMOSTATIC VALVE SHOWERHEADS

QUESTION 1

As Whole House (PWHRP) retrofit staff know, ED is planning to include low-flow & thermostatic control showerheads in the final prescriptive package of measures for PWHRP.

ED is therefore considering ways to minimize the potential for 'double counting' the savings claimed for low-flow & thermostatic control showerheads in PWHRP.

Toward this end, we request that your companies provide an estimate to ED of the fraction low-flow & low flow thermostatic control showerheads obtained by PWHRP contractors that will be obtained through distribution channels that

- 1) ARE LIKELY to have already participated in midstream or upstream incentives for these devices; include specific examples of distributors, wholesalers or retailers that represent this option.
- 2) are NOT LIKELY to have participated in midstream or upstream incentives for these devices; include specific examples of distributors, wholesalers or retailers that represent this option

Answers 1

- 1) 0% are likely to have already participated in midstream or upstream incentives (see explanation below).
- 2) 100% are not likely to have participated in midstream or upstream incentives for these devices (see explanation below).

If low-flow and/or thermostatic control showerheads are included in the PWHRP package as a required measure, PG&E will put a system in place that will eliminate double counting concerns. Participating contractors will be required to purchase the devices directly from the program implementer, who will develop a bulk purchase arrangement separate and aside from core program offering(s) through HEER. Subsequently, none of the low-flow or thermostatic control showerheads will have already participated in midstream or upstream incentives.

PG&E disagrees with the mandatory inclusion of showerheads to the PWHRP and is concerned that the addition of low-flow and/or thermostatic control showerheads as a required measure in the PWHRP package will negatively impact program participation. These concerns are summarized below:

- Inclusion of required showerhead devices in the PWHRP package was not vetted through the 6 month stakeholder informed Program Development process undertaken at the direction of ED or by the stakeholders comprising the California Home Energy Retrofit Coordinating Committee (CA HERCC);
- PG&E believes that a number of potential PWHRP customers will either (a) already have these devices installed or (b) prefer not to install the devices because of comfort or system compatibility concerns; and
- During coordination meetings last week, the State Energy Program (SEP) Residential Retrofit awardees in PG&E's service area expressed concern that requiring the showerhead devices would negatively impact program participation for the same reasons mentioned above.

In summary, PG&E supports inclusion of low-flow and/or thermostatic control showerheads as encouraged, but optional, measures in the PWHRP package.