

From: [Redacted]
Sent: 11/15/2010 2:51:57 PM
To: Lai, Peter (peter.lai@cpuc.ca.gov); Tapawan-Conway, Zenaida G. (zenaida.tapawan-conway@cpuc.ca.gov)
Cc: Ramaiya, Shilpa R (/o=PG&E/ou=Corporate/cn=Recipients/cn=SRRd); [Redacted]
[Redacted]
Bcc:
Subject: RE: Energy Efficient Televisions Revision 3 (PGECOAPP104 R3) Revised Non-DEER Deemed Product Work Paper

Peter,

Thank you for your prompt reply. I will pull together the PG&E team to review your response and offer you more detailed feedback within a few days. We would like to work collaboratively with Energy Division to resolve any outstanding issues. In the mean time, we would appreciate it if you and Zenny would clarify Energy Division's position regarding your statement below concerning implementation of the Phase 2 review process.

"I informed her [Redacted] that ED has not implemented Phase 2 review yet and to please wait for that process."

The ALJ's ruling of November 18, 2009 on this matter states the following.

"On November 3, 2009, Energy Division provided the IOUs with the required document that details the requirements and procedure for the utilities to submit non-DEER measure workpapers for Energy Division's review and approval. This Ruling formally issues this document, which is attached to this Ruling.

IT IS RULED that the attached Energy Division requirements and procedure for IOUs to submit non-DEER measure workpapers for Energy Division review and approval is adopted."

In looking at the adopted procedure I noticed that Energy Division made two commitments relative to the Phase 2 procedure. The first commitment was to develop a uniform workpaper template for the Utilities will use for all future new non-DEER measure submissions. The second commitment was to publish a document which outlines the Energy Division approved methods for utilizing DEER values and approaches in the development of DEER derived workpaper values. Energy Division committed to publish these documents by the end of the 2nd Quarter in 2010. However, the procedure makes no mention of any implementation activities after the second quarter of this year. For this reason we view the Phase 2 process as complete. We also believe that Zenny may share this view based on statements made during the prehearing conference concerning the IOUs petition for modification of D. 09-09-047.

We thank you both for clarifying Energy Division's position.

[Redacted]

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From: Lai, Peter [mailto:peter.lai@cpuc.ca.gov]

Sent: Monday, November 15, 2010 11:13 AM

To: [Redacted] Tapawan-Conway, Zenaida G.

Cc: [Redacted]; Ramaiya, Shilpa R; [Redacted]

Subject: RE: Energy Efficient Televisions Revision 3 (PGECOAPP104 R3) Revised Non-DEER Deemed Product Work Paper

Redacted

Thank you for your email. As you were not in the various ED-Joint Utilities meetings we had earlier in the year on the non-DEER review process, you might have been caught up to speed with the various background from these meetings.

First, Energy Division Review Team reviewed under Phase 1 PG&E workpaper for televisions, workpaper ID: PGECOAPP104. ED's recommendation for the workpaper was:

Approval upon inclusion of the following revisions:

1. Revision of first year program baseline to consider most recent Energy Star retailer data for non-qualifying appliances.
2. Consideration of HVAC interactive effects.

In the ED-Joint Utilities meetings, it was agreed that for workpapers categorized as "Approval

Upon Inclusion of Revisions', the utilities will revise per ED recommendations and upload the revised workpaper onto base camp. We also agreed to an honor system whereby ED may or may not review the revised workpapers but that the utilities will make the revisions per ED's recommendations. Please see attached ED's non-DEER HIM workpaper review disposition for Phase 1 that were sent to the utilities.

As for incremental costs, I've spoke with and email corresponded with [Redacted]. I informed her that ED has not implemented Phase 2 review yet and to please wait for that process.

Second, correct me if I'm wrong, but the workpapers you listed in your other email appears to be new workpapers.

Consumer Notebook Computers Revision 0 (PGECOCOM108 R0)

Business Notebook Computers Revision 0 (PGECOCOM109 R0)

Business Printers and Multifunction Devices Revision 0 (PGECOCOM110 R0)

As I have mentioned to [Redac] and [Redacted], ED has not implemented Phase 2 review for new workpapers.

If you need additional clarification, please call me at (213) 576-7087.

Thanks,

Peter

From: [Redacted]
Sent: Monday, November 15, 2010 9:14 AM
To: Tapawan-Conway, Zenaida G.; Lai, Peter
Cc: [Redacted] Ramaiya, Shilpa R; [Redacted]
Subject: Energy Efficient Televisions Revision 3 (PGECOAPP104 R3) Revised Non-DEER Deemed Product Work Paper

Zenaida Tapawan-Conway and Peter Lai:

As you know, Energy Division's practices for submittal, review, and 'freezing' of Utility developed non-DEER ex ante energy efficiency measures have been clarified as a result of the Commission's process for addressing the Utilities September 17, 2010 petition for Modification of Decision 09-09-047.

Timely approval of work papers is essential to PG&E's effort to manage its Energy Efficiency portfolio in a cost effective manner.

This email is to confirm that the "Energy Efficient Televisions Revision 3 (PGEAPP104 R3)" revised non-DEER deemed product work paper is approved by the Energy Division pursuant to the November 18, 2009 ALJ Ruling Regarding Non-DEER Measure Ex Ante Values.

This work paper was posted to the Energy Division Basecamp website on June 4, 2010 by PG&E. Pursuant to the process laid out for "Conditional Approval" in the November 18 ruling all recommendations from ED regarding the PG&E Energy Efficient Televisions Revision 2 (PGEAPP104 R2) work paper review were incorporated into Revision 3.

In addition to incorporating these recommendations, the Incremental Measure Cost section methodology was revised from the methodology presented in Revision 2. Given the process from the November 18, 2009 ruling PG&E followed all necessary steps of submitting the change, providing a brief description of the changes and dating the submission¹. The date of IMC section update was identified in the Basecamp message posted by PG&E on June 4, 2010 along with the work paper documents. A follow-up message by PG&E requesting a status update on this Revision 3 work paper was posted to the ED Basecamp website on June 29, 2010. Given that ED has not responded to the original submission within the defined 20 day time frame PG&E must consider the "Energy Efficient Televisions Revision 3 (PGEAPP104 R3)" work papers accepted.

Sincerely,

Redacted

PG&E

Principal, IDSM Energy Efficiency Statewide Lead

Redacted

1 – See page 8 of the attachment to the November 18, 2009 ALJ Ruling regarding the Resubmission Process