

From: [Redacted]
Sent: 12/17/2010 5:32:49 PM
To: Lamming, Jean A. (jean.lamming@cpuc.ca.gov); Drew, Tim G. (tim.drew@cpuc.ca.gov); Tapawan-Conway, Zenaida G. (zenaida.tapawan-conway@cpuc.ca.gov); ska@cpuc.ca.gov (ska@cpuc.ca.gov); seb@cpuc.ca.gov (seb@cpuc.ca.gov)
Cc: Ramaiya, Shilpa R (/o=PG&E/ou=Corporate/cn=Recipients/cn=SRRd); [Redacted]
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[Redacted]; Klotz, Michael (Law) (/O=PG&E/OU=Corporate/cn=Recipients/cn=MIKe)

Bcc:

Subject: Comments on Version 1 of 2010-12 EM&V Plan

Dear Zeny:

Attached are PG&E's comments on the December 16th draft of the EM&V Plan. Thanks for allowing us to submit these. PG&E generally supports the plan produced by ED and its consultants. Because of the quick turnaround time however, we have not had proper time to do the comprehensive review one would reasonably expect to perform on such an important and complex document. As such we have not been able to solicit buy-in from PG&E's management on its contents. Therefore, the comments below are not meant to be exhaustive and PG&E may have additional comments at a later date.

PG&E requests the following revisions to the transmittal letter. These revisions touch on the discussion the IOUs had with ED at the afternoon session of our December 14th meeting.

1. Based on our discussion at the December 14 meeting and the fact that ED is issuing this document for the purpose of soliciting public comment in advance of the January 14th workshop, PG&E believed this to be a draft document at this point. PG&E therefore requests that the "Draft" label be returned to the cover page. In addition, PG&E also requests that the following sentence in the transmittal letter be removed: "However, the attached Version 1 of this work plan is not a draft.". The following sentence in the transmittal letter should be revised to read, "While we will update Version 1 of the work plan, as noted above, we do not expect to hold off on its implementation while feedback comes in, or to formally answer written stakeholder input as has been our practice with EM&V reports."
2. PG&E requests that ED remove the statement in the transmittal letter that ED "prepared this plan in close cooperation with the evaluation staffs of the IOUs." PG&E requests that the final paragraph be revised to read: "Lastly, we note that we prepared this plan with input from the energy efficiency evaluation staffs of the IOUs. We appreciate their insights and input and look forward to continuing to work closely with them to implement this plan." PG&E appreciates that ED removed from the document cover, the statement that the plan was "prepared in collaboration with" PG&E and the other IOUs and has endeavored to find another way to describe PG&E's involvement in the process. However, for the same reasons we discussed on December 14th, the statement of "close cooperation" could easily be misinterpreted to imply that PG&E, in fact, supports this version of the plan in its entirety. While PG&E certainly welcomes the opportunity to provide budget information and other input for consideration and to meet with ED to discuss the plan, PG&E is not prepared to state at this time that it is in agreement with all aspects of the EM&V plan, and particularly with some of its budgeting aspects. Therefore, PG&E requests this modification to the transmittal letter.

Thanks, Zeny. If you have any questions, please feel free to contact [Redacted] or [Redacted]

Redacted as I will be off on vacation through the end of the year.

Warmest Regards,

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