From:	Redacted			
Sent:	4/11/2011 4:31:05 PM			
To:	'joy.morgenstern@cpuc.ca.gov' (joy.morgenstern@cBGettig@semprautilities.com))cpuc.ca.g	(ov); 'Gettig, Brenda'	
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Cc:	Seager, Jonathan (/O=PG&E/OU=Corporate/cn=R Michael (Law) (/O=PG&E/OU=Corporate/cn=Rec Redacted			
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Subject: IDSM Cost-Effectiveness Workshop and Whitepaper Comments - PG&E Brenda, et. al:

Attached and included in this e-mail you will find PG&E's comments on the IDSM Cost Effectiveness Whitepaper discussed and distributed for the public workshop. PG&E appreciates this opportunity to provide high-level comments on this latest revision of the whitepaper and looks forward to future discussions with the IOUs, Energy Division, and other parties on the future of IDSM.

Please feel free to contact Jonathan Seager (415-973-6410) if you have any questions.

Regards,

Luke

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IDSM - Portfolio Optimization Pacific Gas and Electric Company

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PG&E comments on draft CE whitepaper; 4/11/11:

The cost-effectiveness draft white paper is a good high-level discussion of some of the major issues involved with integrating existing DSM cost-effectiveness frameworks. In addition, the paper explores areas that might be included in a future integration effort, which is the basis for an interesting discussion. However, PG&E sees three issues with the findings in the paper:

- 1. Integration of local market, T&D, AMI and other micro-level data: PG&E supports incorporation of more micro-level data in determining cost-effectiveness, however, at this point in time, most of that data is not currently available and is not expected to be readily available for several more years.
- 2. Methodology example: While B&V has included an example in the draft whitepaper, the example is at a very high level and has not been explained sufficiently (either in the paper or at the workshop) so as to be able to determine whether the proposal merits implementation and/or is feasible. As a result, the whitepaper, while an interesting discussion, does not present a compelling path toward phase two of the CE integration effort.
 - 3. Clarity: PG&E believes that while there is value to exploring other dates and methods to accomplish CE, there is a history of CE methodologies for EE, DG, and DR that should not be departed from lightly. Particularly for DG, a BC methodology was adopted fairly recently, following a long and contentious process. It is not obvious that a significant departure is warranted at this time.