

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.