

From: [Eilert, Patrick](#)
To: [Anderson, Mary](#)
Subject: FW: IOU Comment Letter to DOE
Date: Wednesday, July 12, 2017 4:08:05 PM
Attachments: [Redline Regulatory Reform Comments_SK_NW_20170712 marked up.docx](#)

Let's discuss. I committed to reviewing this latest version, but not to making any specific changes.

From: Kristjansson, Sue [mailto:SKristjansson@semprautilities.com]
Sent: Wednesday, July 12, 2017 3:24 PM
To: Eilert, Patrick; 'Michelle Thomas (Michelle.Thomas@sce.com)'; Zeng, Kate
Subject: IOU Comment Letter to DOE

*******CAUTION:** This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.*****

Good afternoon managers,

Based on conversations I had with each of you we've modified the comment letter to reflect a more measured response to the DOE's inquiry. I see their RFI as an opportunity for us to shape where we want them to go and if we simply agree with all that has been in the past we run the risk of this administration eliminating EERE altogether (that is up for discussion and has some support). It behooves us to come up with valid and reasonable recommendations for improvement so that we can get through the next years and beyond.

I will note that we added the element of the furnace rule methodology and although I mentioned that we may be willing to remove that from the main letter with all four IOU's, I'm not sure that my upper management is supportive of that offer, they are still reviewing and feel that is an important element for us. Note that we are not requesting that the DOE throw out the Monte Carlo method, just conduct a review of how it interacts with the different measures that are considered and have a good peer review of the result to ensure we don't end up where we did with the furnace rule. I think it's a reasonable request.

Please review the attached revised (redline) version to see if we are able to find common ground and sign on together as the four California IOU's. If you could review as quickly as possible and get back to me, we are low on time with the comments due on Friday.

Thanks!

Sue Kristjansson

Codes & Standards and ZNE Manager

SoCalGas

Email: skristjansson@semprautilities.com

Office: (213) 244-5535

Cell: (424) 744-0361



August 1, 2017

Mr. Daniel Cohen
U.S. Department of Energy
Office of the General Counsel
1000 Independence Avenue, SW.
Washington, DC 20585

ID Number: DOE_FRDOC_0001-3375

Dear Mr. Cohen:

This letter comprises the comments of list participating utilities in response to the Department of Energy's (DOE's) Request for Information (RFI) as part of its implementation of Executive Order 13771 (The Office of the White House 2017) (~~The Office of the White House 2017~~). These comments focus specifically on DOE's Appliance and Equipment Standards Program as well as the energy efficiency standard and test procedure regulations developed and implemented by this program.

The signatories of this letter, collectively referred to herein as the California Investor-Owned Utilities (CA IOUs), represent some of the largest utility companies in the Western United States, serving over 35 million customers combined. As energy companies, we understand the potential of DOE's regulations, developed and updated by the Appliance and Equipment Standards Program, to cut costs and reduce energy consumption for our customers while maintaining or increasing the value of covered products and appliances. We have witnessed the implementation of existing appliance standards developed by DOE over the past two decades and seen their effectiveness through significant energy savings from covered products. These standards have been an effective and critical tool in reducing energy use in homes and businesses nationwide, freeing up economic resources for alternate uses.

The CA IOUs have been involved with DOE's Appliance and Equipment Standards Program ~~since 2001~~ as stakeholders in DOE's public rulemaking process ~~since 2001~~. SoCalGas has Southern California's Utilities have formal representation on in the , and SoCalGas has been a formal members of the general Appliance Standard and Rulemaking Federal Advisory Committee (ASRAC) since 2016 when SoCalGas representative Ms. Michelle Sim was invited by the then Secretary Moniz to join admitted in 2016. Ms. Sim represents the interests of the California IOU's through her position on the committee. We appreciate DOE's efforts to solicit input from stakeholders on how best to implement Executive Order 13771 to achieve meaningful burden reduction, while continuing to meet DOE's statutory responsibilities in accordance with the Energy Policy and Conservation Act of 1975 (EPCA), as amended (Energy Conservation

~~Standards n.d.) (Energy Conservation Standards n.d.).~~ The CA IOUs ask DOE to carefully consider the following comments in response to this RFI.

Energy Efficiency Regulation Impacts: Nationwide

As directed by Executive Order 13777 ~~(The Office of the White House 2017) (The Office of the White House 2017)~~, the regulatory reform task force will identify regulations that, among other things, are “ineffective.”² ~~Overall, the~~ The CA IOUs believe DOE’s appliance and test procedure regulations are in fact among the most impactful and effective policy tools that help in reduce ~~ing~~ energy consumption and drive ~~ing~~ technology innovation. ~~We~~ The CA IOUs outline some of the positive aspects and impacts in the proceeding following sections. ~~With that said, However,~~ we are of the opinion there is always room for improvement. It ~~and it is~~ in this spirit that the CA IOUs have in the past submitted constructive comments in the scope of numerous rulemakings, and it is also in this spirit that we subsequently provide further their recommendations for improvement as responses to select DOE RFI questions below in this document. ~~DOE currently develops, updates, and implements energy efficiency regulations and test procedures for more than 60 appliances. These products represent about 90 percent of home energy use, 60 percent of commercial building energy use, and 30 percent of industrial energy use. Nationally, the cumulative positive impacts of these regulations are massive: by 2020 an estimated \$1 trillion will have been saved on consumers’ utility bills and 71 quadrillion British thermal units (quads) of energy will have been avoided (U.S. Department of Energy 2017). DOE efficiency standards have significantly impacted energy demand since the mid-1990s. Figure 1 depicts the cumulative annual energy savings, in quads, from DOE energy efficiency regulations since the first standards took effect.~~

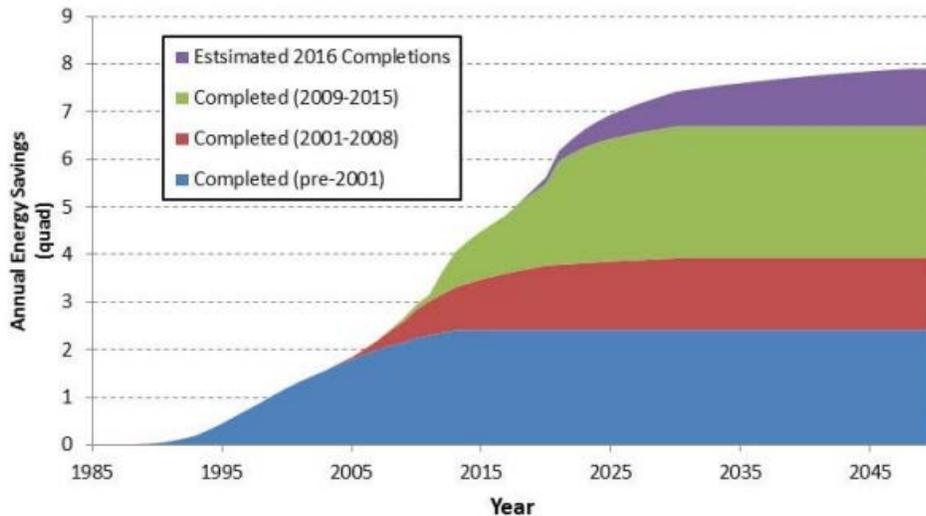


Figure 1: Energy savings as a result of DOE appliance efficiency regulations¹.

Source: U.S. Department of Energy, 2016.

Energy Efficiency Regulation Impacts: States and Utilities

Many states have compelling needs for advanced appliance efficiency standards, either due to energy costs, state policy goals, regional differences, or other factors. Federal appliance standards can be a one of the strong est policy tools for reducing energy use in existing buildings. For example, in California, the California Public Utility Commission (CPUC) established an energy goal for zero net energy (ZNE) performance in new residential construction by 2020 and in new commercial construction by 2030 (California Public Utility Commission 2008) (California Public Utility Commission 2008). Advanced appliance efficiency standards will play a significant part in making the achievachievement ing-of these goals realistic.

Utility rebate and other voluntary programs that incentivize efficient products, such as the Environmental Protection Agency (EPA) ENERGY STAR[®] program, are critical to achieving economies of scale that drive costs down for advanced efficiency technologies. DOE rulemakings inform the creation of ENERGY STAR programs, and the outcomes of these programs can inform future DOE rulemakings in a cycle of continuous improvement.

These programs, as well as DOE’s energy conservation standards (ECS) rely on energy consumption metrics based on DOE test procedure regulations. By developing and regularly revising test procedure regulations to incorporate market developments, technological changes, and lessons learned, DOE provides a stable foundation for quantifying and comparing appliance

¹Typo in legend from original report: purple wedge label should read “Estimated 2016 Completions”

performance. This is critical for meaningful standards and programs, and we support DOE in these efforts. Thus, it is critical to periodically review and update test procedures, as prescribed in EPCA, to ensure the energy metrics are representative of new features, technologies, and actual performance.

Energy Efficiency Regulation Impacts: Driving Innovation

DOE energy efficiency regulations advance technological innovation in energy efficiency technology. Voluntary programs support commercialization of emerging technologies by incentivizing the adoption of promising technologies in the early phase of market introduction and accelerate future rapid increase of market adoption. Adoption into regulation stimulates the appliance manufacturers to develop new, differentiated products in response to their high-margin, high-efficiency products becoming the new baseline when new DOE standards take effect. This promulgates energy efficiency, societal progress in general, and domestic and international competitiveness – in fact, innovation is a cornerstone of the world’s most successful economies. For example, lighting efficiency regulations adopted in 2007 signaled a shift away from traditional incandescent light bulbs. At the time, CFLs were considered the prime candidate to fill the void; but over the next ten years, a significant amount of investment and innovation in this industry resulted in the introduction of several new product types that provided improved efficiency without the apparent quality or performance issues plaguing CFLs. These innovations included halogen light bulbs, and later LED light bulbs that are dimmable, have very good color quality, and are virtually indistinguishable from traditional products. This process continues cyclically, as efficiency regulations are adopted and updated periodically, driving products toward greater, cost-effective energy efficiency innovations with each cycle.

In a retrospective study looking at the effect of DOE efficiency regulations, the study authors found that for each of the ten different products examined, manufacturers introduced and expanded the availability of new features as efficiency regulations took effect (Mauer, et al. 2013).

The Appliance Standards Program provides benefits for the nation, individual consumers and businesses, and manufacturers.



- Saves billions of dollars on energy costs to put back into the economy
- Reduces energy waste by increasing energy efficiency
- Creates and protects manufacturing jobs in the U.S.
- Spurs innovation and competition in the marketplace



- Generates significant utility bill savings for households and businesses
- Increases the availability and affordability of energy efficient products
- Disseminates reliable and comparable product operating cost information
- Provides access to improved products with new features and comfort attributes



- Reduces regulatory burden by pre-empting a potential patchwork of state standards with a single Federal standard
- Protects manufacturers of quality products from those manufacturing inferior products, including imports
- Creates economies of scale which decrease costs to develop and produce innovative energy efficient technologies
- Facilitates market introduction of energy efficient technologies by validating product performance

Comment [GD1]: Why use the DOE chart, instead add verbiage

Comment [ME2]: Removed and edited section above

Figure 2: Summary of benefits from appliance standards.

Source: U.S. Department of Energy, 2017.

EPCA Requirements

DOE's regulatory reform task force is also tasked with identifying regulations that impose costs that exceed benefits. EPCA has safeguards in place to ensure efficiency regulations do not violate this requirement with the following provisions (Energy Conservation Standards n.d.):

(B)(i) In determining whether a standard is economically justified, the Secretary shall, after receiving views and comments furnished with respect to the proposed standard, determine whether the benefits of the standard exceed its burdens by, to the greatest extent practicable, considering—

- (I) the economic impact of the standard on the manufacturers and on the consumers of the products subject to such standard;*
- (II) the savings in operating costs throughout the estimated average life of the covered product in the type (or class) compared to any increase in the price of, or in the initial charges for, or maintenance expenses of, the covered products which are likely to result from the imposition of the standard;*
- (III) The total projected amount of energy, or as applicable, water, savings likely to result directly from the imposition of the standard.*

Comment [KS3]: However...if the methodology is inaccurate or erroneous then the secretary does not have the right information on which to base his assessment.

Specifically, EPCA requires every energy efficiency standards regulation promulgated by DOE to be “economically justified,” specifically requiring that the cumulative benefits of the regulation exceed the cumulative costs. As discussed below, DOE regularly overestimates appliance product prices and life cycle costs post regulation, thereby resulting in outcomes that are more economically beneficial than predicted.

As directed by Executive Order 13777, the regulatory reform task force shall also identify regulations that are “outdated” (The Office of the White House 2017). EPCA again provides statutory requirements to ensure that efficiency standards and test procedures are reviewed on a periodic basis. Since DOE has expanded the Appliance and Equipment Standards Program to cover a larger share of home, commercial, and industrial energy use, it is increasingly important for DOE to retain its ability to update current energy efficiency standard and test procedure regulations on a periodic basis to ensure standards remain relevant.

Responses to Select DOE Questions

Below are the CA IOU responses to some of the specific questions listed in the RFI.

Question 1: How can DOE best promote meaningful regulatory cost reduction while achieving its regulatory objectives, and how can it best identify those rules that might be modified, streamlined, or repealed?

- Regarding streamlining regulations, the CA IOUs strongly support the efforts of the Appliance Standards and Rulemaking Federal Advisory Committee (ASRAC) established by DOE to improve the process of establishing and updating certain energy efficiency regulations by facilitating stakeholder engagement, data collection, and consensus-building among impacted stakeholders. ~~The CA IOUs are~~ SoCalGas is currently a member of ~~the~~ ASRAC, representing Investor Owned Utilities interests from Southern California.

The ASRAC working group process streamlines certain efficiency regulations – reducing the overall time a rulemaking takes to finalize as compared to a typical “notice and comment” rulemaking. For example, the commercial package air conditioners final rule, which was negotiated through an ASRAC working group, was finalized in eight months from the establishment of the ASRAC working group to a DOE direct final rule.² The process would have taken significantly more time, likely several years, had it gone through a non-negotiated rulemaking. This process implemented by DOE should continue to be used for other products, where it makes sense, as a way to shorten rulemaking timelines, thereby reducing overall regulatory costs for both stakeholders and DOE.

In addition to the reduced costs associated with the regulatory process, another major advantage of the ASRAC process is the possibility to establish multi-tier standards. This approach provides manufacturers with regulatory certainty over a longer period of time, enabling them to invest and plan for multiple rounds of standards. Multi-tier (or multi-phase) standards can enhance the efficiency and cost-effectiveness of rulemaking activities by having one analysis that leads to two standard updates at future dates. The first tier would follow DOE’s statutory requirements in establishing the level that is technically feasible, economically justified, and results in the most energy savings. The second tier could be more an aspirational level that may only become cost effective in the future, such as the maximum technologically feasible level.

DOE accepted this multi-tier approach from the outcome of ASRAC working group for the commercial package air conditioners final rule, which updated standard levels with a compliance date of January 1, 2018 for the first tier and January 1, 2023 for the second tier (Energy Efficiency and Renewable Energy Office, Department of Energy 2016). This multi-tier approach was strongly supported by industry, efficiency advocates, consumer groups, and utilities for this product category.

² DOE published the intent to establish the working group was published in April 2015, the working group finalized a term sheet in June 2015, and DOE published a direct final rule in December 2015.

Question 2: What factors should DOE consider in selecting and prioritizing rules and reporting requirements for reform?

- DOE should prioritize promulgating efficiency regulations that account for different regional impacts. ~~For example, in 2011, DOE finalized regional regulations for residential central air conditioners and heat pumps, the first standards promulgated by DOE that differed due to varying efficiency needs for this equipment in different regions of the United States.~~ Based on levels agreed to by a coalition of stakeholders, the standards set efficiency levels for three regions based on the number of heating degree days and climate zone, ~~a significant improvement compared to the previous version of this regulation.~~ DOE should seek ~~such~~ legislative changes ~~for all in order to consider prioritizing the promulgation of regional energy and water efficiency regulations for products where there is an opportunity to address the unique typical uses, performance, savings opportunity and cost/benefit, and consumer impact vary with location. needs of a location, such as severe drought conditions or increasingly severe winter storms.~~
- In promulgating new or updated efficiency regulations, DOE should leverage existing voluntary standards, such as the ENERGY STAR Program, ~~or AHRAE standards,~~ and ~~leverage~~ relevant information associated with the voluntary standards (e.g., shipment data, technology adoption, etc.) to help form the basis of new or updated mandatory standards. Leveraging existing data could potentially reduce the costs of undergoing certain efficiency regulations.
- ~~DOE should prioritize rules based on the specific development cycles of each unique appliance industry. EPCA prescribes a five year gap between the publication of the final rule and the compliance date for standards of newly covered products. In prioritizing the establishment of new energy efficiency regulations for currently uncovered products, the CA IOUs believe DOE should seek legislative changes that provide it more flexibility in setting earlier effective dates for products where the market is rapidly changing, such as lighting products and electronics equipment.~~

~~One study suggests that consumer product development cycles typically take just under 2.5 years for new to the world products (i.e., highly innovated products). Figure 3 is a graphical representation of the study results. For products and product lines with major revisions, (i.e., those potentially affected by a DOE standard), the average product development cycle is approximately 15 months. According to this study, on average, industrial firms have been taking 2.25 years to develop their more innovative projects.~~

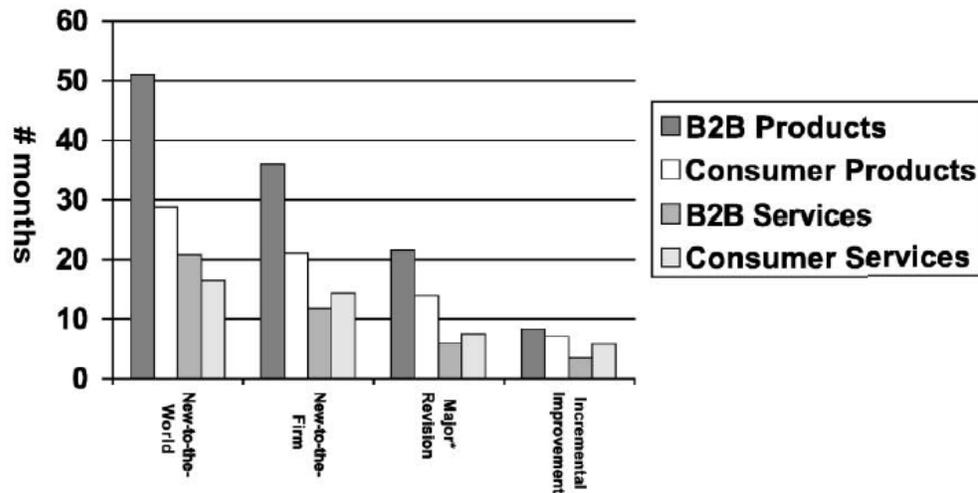


Figure 3: Average product development cycles by product type³.

Source: Griffin, 2002.

With this compelling evidence that product development cycles are significantly shorter than five years, we urge DOE, based stakeholder input, to consider a shorter time period between the final rule and compliance dates on a case by case basis for each rulemaking. Additionally, this would ensure that standards are applicable to products on the market at the time of compliance.

Question 3: How can DOE best obtain and consider accurate, objective information and data about the costs, burdens, and benefits of existing regulations? Are there existing sources of data DOE can use to evaluate the post-promulgation effects of regulations over time? We invite interested parties to provide data that may be in their possession that documents the costs, burdens, and benefits of existing requirements?

- There are a number of retrospective studies [by environmental advocates](#) that have reviewed the impacts of DOE efficiency regulations, which are cited below. [Energy-They found that energy](#) efficiency regulations have provided significant economic benefits for consumers through saving energy and freeing up funds for other use, which culminates in broader macroeconomic benefits to both the local and national economy.

One study examined the impacts of energy efficiency standards on ten residential and commercial [lighting-electric-powered](#) products⁴. The study concluded that for the ten

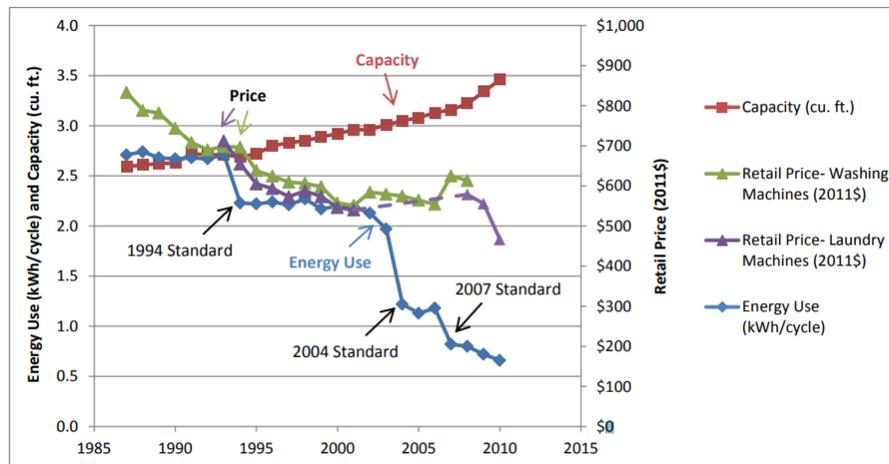
³B2B (Business to Business)

⁴ The product types were refrigerators, clothes washers, dishwashers, residential central air conditioners and heat pumps, toilets, general service light bulbs, incandescent reflector lamps, fluorescent lamp

products studied⁵, as efficiency regulations take effect, performance of the products improves and products become more feature-rich (Mauer, et al. 2013). ~~Figure 1~~ ~~Figure 4~~ provides a graphical representation of price declines for residential clothes washers paired with capacity increases and increased energy efficiency as each new standards update takes effect.

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Sources: AHAM (2011) for energy use and capacity; authors' analysis of U.S. Census Bureau Current Industrial Reports for price; DOE (2012c) for markup.

Figure 1: Clothes washer energy use, volume, and retail price from 1987-2010⁵.

Source: Mauer, deLaski, Nadel, Fryer, & Young, 2013.

Another report examines the job increases through 2030 due to utility bill savings associated with current and prospective energy efficiency standards. Based on the report's analysis, an average of 318,000 jobs are created annually for historic standards with an expected additional 47,000 jobs created annually for prospective standards (Gold, et al. 2011) (Gold, et al. 2011). A paper published in the Energy Policy Journal estimates 0.38 job-years are created for every GWh of electricity saved due to energy efficiency measures (Wei, Patadia and Kammen 2010) (Wei, Patadia and Kammen 2010). Another report further supported this concept by citing that "the positive economic impacts of MEPS [Minimum Efficiency Performance Standards] on consumers may have been underestimated" (Taylor, Spurlock and Yang 2015). One of the goals of DOE's regulatory reform task force is to identify regulations that "eliminate jobs, or inhibit job gains". T, and this research shows that impacts of energy efficiency regulations on jobs and consumers may have been underestimated. Based on multiple studies, efficiency regulations have a positive impact on jobs consequently, they should not be repealed.

ballasts, commercial rooftop air conditioners and heat pumps, and refrigerated beverage vending machines.

⁵ "Price data were available from 1987-2008 for washing machines and from 1993-2001 and 2008-2010 for laundry machines (washers & dryers)" (Mauer, et al. 2013).

~~These impacts will likely be greater than predicted in the future as there is evidence that DOE has overestimated price increases for appliances after standard implementations. Based on one Another study, looking at 10 eight mostly electric powered products⁶ showed that the median price increase of an appliance after regulation was \$10, significantly less than the median DOE estimate of a \$108 increase. Another report further supported this concept by citing that “the positive economic impacts of MEPS [Minimum Efficiency Performance Standards] on consumers may have been underestimated”. These results are examples that job creation and consumer savings may likely be greater than predicted by DOE in the future, making future efficiency regulations even more critical for the future macroeconomic health of the nation.~~

Question 4: Are there regulations that simply make no sense or have become unnecessary, ineffective, or ill-advised and if so what are they? Are there rules that can simply be repealed without impairing DOE’s statutory obligations and, if so, what are they?

- In regards to regulations considered for repealing, the CA IOUs highlight the following anti-backsliding provision in EPCA. We understand that it prevents DOE from updating existing finalized regulations in such a way that it would result in either increases in the maximum allowable energy use or decreases the minimum required energy efficiency of a covered product (Energy Conservation Standards n.d.):

The secretary may not prescribe any amended standard which increases the maximum allowable energy use, or, in the case of showerheads, faucets, water closets, or urinals, water use, or decreases the minimum required energy efficiency, of a covered product.

Conversely, DOE can modify non-finalized regulations, such as the furnace rulemaking. SoCalGas and other parties docketed comments in that rulemaking, strongly questioning whether economic benefit had been appropriately demonstrated. Critical comments included, but were not limited to:

- Many input data points were intransparent, not available for review, or outdated,
- Many assumptions were not properly justified,
- Fuel switching considerations were not aligned with market experience
- The no-new-standards-case consumer choice model was inaccurate
- The accuracy of the methodology using probability distributions was extremely difficult to confirm due to the complexity of the models and the software in use
- Incomplete consideration of regional differences, e.g. for California
—stating that the life cycle cost (LCC) methodology had numerous shortcomings such as:
—poor fuel switching considerations

⁶~~The product types were refrigerators, clothes washers, electric water heaters, non-electric water heaters, three-ton central air conditioners (ACs), room ACs, 15-ton commercial ACs, and ballasts.~~

~~inaccurate no new standards case consumer choice model~~

~~poor justification and transparency for some assumptions and input data
costly and complex proprietary software (i.e. Crystal Ball)~~

Question 5: Are there rules or reporting requirements that have become outdated and, if so, how can they be modernized to better accomplish their objective?

- No comment.

Question 6: Are there rules that are still necessary, but have not operated as well as expected such that a modified, or slightly different approach at lower cost is justified?

- Associated with our comments on Question 1 regarding ASRAC, the CA IOUs believe that the stakeholder negotiation approach should be considered for other rulemakings where appropriate. The streamlined process of ASRAC reduces the regulatory costs for both stakeholders and DOE in the long-term. Additionally, ASRAC could be used to help address test procedures and standards that may need to be updated based on technological innovations outside of the scheduled review cycle to ensure the regulations are still relevant. Having a nimbler process to update regulations would be helpful for utility incentive programs, which are based on the test procedures and standard regulations developed by DOE.

Question 7: Are there rules of the Department that unnecessarily obstruct, delay, curtail, or otherwise impose significant costs on the siting, permitting, production, utilization, transmission, or delivery of energy resources?

- No comment.

Question 8: Does DOE currently collect information that it does not need or use effectively?

- The CA IOUs strongly support DOE's ~~extensive~~ efforts to collect information and work with stakeholders, such as trade organizations and others, in support of establishing and updating efficiency regulations. We support an increase ~~in in data~~ collection ~~of fair and accurate data efforts~~. ~~In particular, it will be helpful~~-to expand public knowledge of appliance shipment information due to the gaps in the data provided by manufacturers and their associations. DOE's efforts to collect ~~and~~ effectively use ~~and share~~ the information ensure rulemakings are data-driven processes. In terms of compliance and enforcement, the information DOE collects ensures the proper implementation of the efficiency regulations promulgated by DOE ~~and the realization of the massive associated consumer benefits previous cited in response to Question 3.~~

In order to make this collection process more seamless and robust, DOE should provide more advance notice about its own planned data collection activities in support of future standards and test procedures rulemakings. If DOE's stakeholders, both manufacturers and non-manufacturers, had a better understanding of DOE's future plans for data

collection for rulemakings, they would be better able to effectively contribute to the process, while simultaneously strengthening DOE's analyses and reducing DOE's regulatory costs. Examples of product data that could be provided to DOE by stakeholders include: energy performance data; market shipment data; testing data on product prototypes; data on retail, installation, and maintenance costs; and energy consumption data of installed equipment.

Question 9: Are there regulations, reporting requirements, or regulatory processes that are unnecessarily complicated or could be streamlined to achieve statutory obligations in more efficient ways?

- DOE should consider staging test procedure and standard rulemaking updates for a given product category so that the test procedure regulations are completed before the standards rulemaking. Staging the rulemakings in this way would be sensible to ensure standards regulations are based on updated metrics and data from a new or modified test procedure.
- [DOE should improve the life cycle cost \(LCC\) methodology and its inputs and models to alleviate the shortcomings identified by SoCalGas and others per the response here to Question 4. This applies to all rulemakings that employ these techniques, not just the cited example of furnaces.](#)
- DOE should work closely with other agencies, such as the EPA, the California Energy Commission (CEC), and the European Commission, to share, where feasible, reported product data. Agency collaboration could reduce duplicative reporting burden for manufacturers. Each of the agencies noted manages public-facing product databases displaying information on product efficiency, among other attributes. Given the overlap of reported data required by these agencies, a standardized test template and single product submission to one entity, such as the CEC's Modernized Appliance Efficiency Database System (MAEDBS), that would be shared with other applicable databases could reduce costs for manufacturers.
- DOE should also consider updating its current compliance certification database to allow stakeholders to more easily search for information on complying products and access test reports. Since utility incentive programs, aimed at increasing adoption of efficient products, establish program requirements based on certified product data, having better access to DOE's database could potentially reduce additional manufacturer reporting burden for products eligible for incentive programs.

Question 10: Are there rules or reporting requirements that have been overtaken by technological developments? Can new technologies be leveraged to modify, streamline, or do away with existing regulatory or reporting requirements?

- As mentioned previously in comments to Question 9, DOE should work closely with other agencies that manage product databases to reduce duplicative reporting burden for manufacturers by sharing product data when applicable. This could reduce costs for manufacturers and could potentially reduce administration costs for DOE. In addition, the

reported product data would be clearer and more consistent for consumers and other stakeholders, such as utilities, that use the product databases.

Question 11: Does the methodology and data used in analyses supporting DOE's regulations meet the requirements of the Information Quality Act?

- No comment.

The CA IOUs thank DOE for the opportunity to be involved in this process and encourage DOE to carefully consider the recommendations outlined in this letter.

Sincerely,

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