

March 4, 2014

**VIA E-MAIL DOCKET@ENERGY.
CA.GOV**California Energy Commission
Dockets Office, MS-4
Re: Docket No. 14-IEP-1A
1516 Ninth Street
Sacramento, CA 95814-5512Re: 2014 Integrated Energy Policy Report: Comments of Pacific Gas and Electric Company
on Draft 2014 Integrated Energy Policy Report Scoping Order

The Integrated Energy Policy Report (“IEPR”) is the leading energy policy report for the State of California and impacts energy policy discussions among elected officials, public agencies, stakeholders, and the public. On February 18, 2014, the California Energy Commission’s (“CEC” or “Commission”) released the Draft 2014 IEPR Scoping Order. Pacific Gas and Electric Company (“PG&E”) appreciates the opportunity to provide comments.

The Draft 2014 Scoping Order identifies four broad topics to be addressed by the 2014 IEPR Update: 1) alternative and renewable fuel and vehicle technology, 2) the renewable projects in the Desert Renewable Energy Conservation Plan (DRECP), 3) energy efficiency for existing buildings, and 4) an electricity update. PG&E is supportive of the inclusion of these topics and appreciates the CEC’s choice to frame each topic broadly, which will ensure a well-rounded approach.

PG&E plans to participate actively in the 2014 IEPR Update process and looks forward to additional details on each of the topics outlined in the Draft 2014 Scoping Order. In anticipation, PG&E’s offers the following preliminary thoughts:

Alternative and Renewable Fuel and Vehicle Technology Program: PG&E supports the Alternative and Renewable Fuel and Vehicle Technology Program and the program’s goal of accelerating the development of alternative transportation fuels, particularly in the electric vehicle market. By providing electric vehicle rebates (via the Clean Vehicle Rebate Project), charging infrastructure incentives and regional planning support, and consumer education efforts, PG&E believes that this program can help address the barriers to electric vehicle adoption. These activities not only support the developing

electric vehicle market, but also help achieve California's climate change policy objectives.

Renewable Projects in the DRECP: PG&E supports inclusion of renewable energy planning, including an update on the DRECP. PG&E strives to procure energy from viable, cost-effective projects. Through collaborative forums for renewable energy planning, such as the DRECP, PG&E hopes to continue progress towards meeting California's Renewable Portfolio Standard (RPS) mandate while avoiding or mitigating project impacts. Renewable energy planning that determines priority areas for development can help minimize siting and investment risks for developers and utilities. The DRECP, in particular, has the potential to play an important role in streamlining the development of renewable energy projects in the desert by providing more certainty for project developers, supporting conservation efforts, and streamlining transmission planning.

Energy Efficiency Program for Existing Buildings: PG&E has long supported energy efficiency programs and actively participated in the development of the initial Comprehensive Energy Efficiency Program for Existing Buildings Draft Action Plan during the 2013 IEPR. PG&E provided extensive feedback on the Draft Action Plan¹ and looks forward to providing further input during the 2014 IEPR Update.

Electricity Update: PG&E has participated actively in the development of the 2014-2024 California Energy Demand Forecasts, both through the 2013 IEPR proceeding and the Demand Analysis Working Group. PG&E supports the CEC's decision to perform a limited off-year update. This will better match many state planning processes that are on one-year cycles.

Additionally, PG&E is pleased to see that the 2014 IEPR Update will maintain the 2013 IEPR's focus on maintaining system reliability. The retirement of the San Onofre Nuclear Generating Station and the scheduled retirement of once-through cooling power plants have created immediate local reliability needs in Southern California. The CEC, California Public Utilities Commission, and California Independent System Operator must continue their coordinated approach to ensure adequate resources are available.

¹ Winn, V. J. (2013). Comprehensive Energy Efficiency Program for Existing Buildings: Staff Workshop on the Comprehensive Energy Efficiency Program for Existing Buildings Draft Action Plan—Comments of Pacific Gas and Electric Company. Pacific Gas and Electric Company. Retrieved from http://www.energy.ca.gov/ab758/documents/2013-06_workshops/comments/PG_and_E_Comments_on_the_Comprehensive_Energy_Efficiency_Program_for_Existing_Buildings_2013-07-12_TN-71638.pdf

PG&E appreciates the opportunity to provide comments on the Draft Scoping Order for the 2014 IEPR Update and looks forward to a collaborative partnership. If you have any questions or need additional information about these written comments, please contact me.

Sincerely,

/s/

Matthew Plummer

cc: Commissioner Janea A. Scott (Janea.Scott@energy.ca.gov)
Heather Raitt (Heather.Raitt@energy.ca.gov)