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CA IOU Comments for 2022 Amendments to the Appliance Efficiency Regulations 15 Day Language

Additional submitted attachment is included below.







March 25, 2024

California Energy Commission **Docket Unit** Docket No. 22-AAER-04 715 P Street, MS-4 Sacramento, CA 95814

Topic: 2022 Amendments to the Appliance Efficiency Regulations Proposed Regulatory Language for 15-Day Comment Period

Dear Corrine Fishman:

This letter comprises the comments of the Pacific Gas and Electric Company (PG&E), San Diego Gas and Electric (SDG&E), and Southern California Edison (SCE), collectively referred to herein as the California Investor-Owned Utilities (CA IOUs), in response to the California Energy Commission (CEC) Proposed Regulatory Language for 15-Day Comment Period regarding 2022 Amendments to the Appliance Efficiency Regulations.

The CA IOUs comprise some of the largest utility companies in the nation, serving over 32 million customers in the state. We are committed to helping customers reduce energy costs and consumption while striving to meet their evolving needs and expectations. Therefore, we advocate for standards that accurately reflect the climate and conditions of our respective service areas.

We thank the CEC for updating Title 20 with changes made to the 15-day language. We especially support the effort to collect data that will support the implementation of state and federal efficiency standards for clothes washers, televisions, and fans. We look forward to the adoption of these changes.

The U.S. Department of Energy (DOE) is proposing changes that will impact many of the products and equipment in this update, including electric motors, air compressors, fans, commercial and central air conditioners and heat pumps, refrigeration equipment, and white goods. After these modifications are confirmed, we encourage the CEC to begin a rulemaking process in late 2024 to make additional updates to Title 20. These revisions will ensure the alignment of state and federal standards and facilitate consistent data collection and compliance of these federally regulated products.

Sincerely,

Michael Burger

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