

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



FILED

07-31-08
04:59 PM

Order Instituting Rulemaking to
Develop the Commission's Energy
Efficiency Strategic Plan

Rulemaking 08-07-011

Joint Application of Pacific Gas and
Electric Company (U39E), Southern
California Edison Company (U338E),
San Diego Gas & Electric Company
(U902E), and Southern California Gas
Company (U904G) Submitting the
California Energy Efficiency Strategic
Plan

Application 08-06-004

**COMMENTS OF CALIFORNIA ATTORNEY GENERAL ON DRAFT
COMMISSION LONG-TERM ENERGY EFFICIENCY STRATEGIC PLAN**

Thank you for the opportunity to provide comments on the California Energy Efficiency Strategic Plan (Plan).¹ We commend the PUC on producing a very ambitious, thoughtful and comprehensive document, and we thank you for your serious consideration of our comment letter to the previous draft dated April 15, 2008. In response to Commissioner Grueneich's letter soliciting input regarding any major gaps and/or omissions in this version of the Plan, we would like to raise one issue that seems

¹ These comments are made on behalf of the Attorney General pursuant to his independent authority to protect the resources of the State and not on behalf of any other California agency or office. (See Cal.Const., art. V, § 13; Cal. Govt. Code, §§ 12511, 12600-12).

critical. The Plan's ambitious goals of 100% zero net energy homes by 2020 and greatly reduced energy use in existing single and multi-family homes will require a significant increase in the use of distributed generation of renewable energy on all types of residential buildings. Therefore, the Implementation Plan should include actions to address the legal and/or regulatory barriers that 1) restrict the ability to install solar PV systems that supply power to residents of condominiums and apartments and 2) prevent using a solar PV system on one building to generate electricity for multiple residences, including, for example, individual unit metering requirements that tend to preclude the use of rooftop solar power system that provides power to multiple residences.

Thank you for your attention to this important issue.

Date: August 8, 2008

Respectfully submitted,

/s/
Sandra Goldberg
Deputy Attorney General

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CERTIFICATE OF SERVICE

I, SARA WISHOM, certify under penalty of perjury under the laws of the State of California that the following is true and correct:

On August 8, 2008 I served the attached:

COMMENTS OF CALIFORNIA ATTORNEY GENERAL

on all eligible parties on the attached lists **A.08-06-004, R.08-07-011, R.06-04-010 and R.07-12-042** by sending said document by electronic mail to each of the parties via electronic mail, as reflected on the attached Service List.

Executed this August 8, 2008, at San Francisco, California.

_____/s/
SARA WISHOM