



**Pacific Gas and
Electric Company**[®]



November 23, 2015

Michael Nearman
Executive Director
Building Standards Commission
2525 Natomas Park Drive, Suite 130
Sacramento, California 95833

Subject: CALGreen 2015 Triennial Rulemaking – 45-day Express Terms

Dear Mr. Nearman,

This letter comprises the comments of the Pacific Gas and Electric Company (PG&E), Southern California Gas Company (SCG), San Diego Gas and Electric (SDG&E), Southern California Edison (SCE), and Los Angeles Department of Water and Power (LADWP) regarding proposed changes to the California Green Building Code (CALGreen). The signatories of this letter, collectively referred to herein as the California Utility Codes and Standards Team (Utility C&S Team), represent some of the largest energy utility companies in the Western United States, serving over 35 million customers.

The Utility C&S Team supports the California Building Standards Commission's (CBSC) efforts to adopt CALGreen water efficiency standards. The proposed standards represent a meaningful response to Governor Brown's April 1, 2015 Executive Order (B-29-15) in response to the drought emergency, the January 2014 declared State of Emergency, and the Governor's direction that state agencies take emergency actions to prepare for and respond to drought conditions. In addition, legislation enacted in 2009 (SB X7 7) established the goal of achieving a 20 percent reduction in urban per capita water use in California by 2020, and California's Global Warming Action Plan calls for more stringent water efficiency standards. Furthermore, there is a clear nexus between water and energy use because twenty percent of the electricity used in California is attributed to water supply, conveyance, treatment, and distribution. Improving water efficiency will result in energy savings.

The Utility C&S Team appreciates the opportunity to participate in this rulemaking and is pleased that the CBSC is intending to adopt the water efficiency standards for commercial food service equipment proposed by the Utility C&S Team. In particular, the Utility C&S Team supports the adoption of the mandatory standards for food waste disposers and the voluntary standards for commercial dishwashers, food steamers, combination ovens, and food waste pulping systems.

The Utility C&S Team also appreciates the opportunity to continue working with state agency staff in future rulemakings to update CALGreen, particularly rulemakings that will improve the water efficiency standards in CALGreen for showerheads, urinals, toilets, residential lavatory faucets, and domestic hot water distribution (e.g., hot water recirculation systems). In addition, we would like to continue working with the California Department of Housing and Community Development and CBSC to add a compact distribution design option into CALGreen in the next cycle. Addressing indoor water use is important for reducing both water and energy consumption in California homes and businesses, particularly in the face of the ongoing drought.

In conclusion, the Utility C&S Team would like to reiterate our support for the CBSC's efforts to reduce statewide water usage through the adoption of water efficiency standards in CALGreen. We thank CBSC for the opportunity to participate in this process and look forward to continuing to work with state agency staff in future rulemakings to update CALGreen.

Sincerely,



Patrick Eilert
Principal, Codes and Standards
Pacific Gas and Electric Company



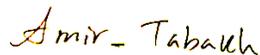
Sue Kristjansson
Codes & Standards Manager
Southern California Gas Company



Steven M. Long, P.E.
Manager, Energy Codes & Standards
DSM Engineering
Southern California Edison



Chip Fox
Residential Programs and Codes & Standards
Manager
San Diego Gas and Electric Company



Amir Tabakh
Chief of Energy Efficiency Engineering
Los Angeles Department of Water and Power