

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

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

Rulemaking 08-07-011
(Filed June 12, 2008)

**INITIAL COMMENTS OF PACIFIC GAS AND ELECTRIC COMPANY ON
PROCEDURAL ISSUES IN ORDER INSTITUTING RULEMAKING TO DEVELOP
THE COMMISSION'S ENERGY EFFICIENCY STRATEGIC PLAN**

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Dated: July 17, 2008

Attorneys for
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I. INTRODUCTION

On July 10, 2008, the California Public Utilities Commission (CPUC) instituted Rulemaking 08-07-011 in continuation of the efforts to ensure efficient use of energy resources in California through the development of a Commission-sponsored California Strategic Plan for Energy Efficiency through the year 2020 and beyond. *See* Order Instituting Rulemaking (OIR) at p.7. Pursuant to the OIR, parties are requested to file Initial Comments addressing limited procedural issues on July 17, 2008. Accordingly, PG&E provides these Initial Comments in compliance with direction in the OIR.

II. DISCUSSION

The OIR provides that parties should file Initial Comments addressing the following procedural issues:

- Identification of the party and interest of the party in this proceeding. (Rule 1.4(b))
- Any objections to or recommendations regarding this order's determinations as to categorization of the proceeding as quasi-legislative, the need for hearing, issues to be considered, or scheduling, (Rule 6.2)

Pacific Gas and Electric Company (PG&E) agrees to its classification as a respondent in this proceeding. In addition, PG&E has no objections to the categorization of this proceeding as quasi-legislative, the issues identified in the Preliminary Scoping Memo; and the preliminary schedule. PG&E also agrees that evidentiary hearings are not needed and that the issues are appropriately resolved through comments and workshops.

III. CONCLUSION

PG&E has no objection to the procedural determinations set forth in the Order instituting R.08-07-011.

Respectfully Submitted,

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By: _____ /s/
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Order Instituting Rulemaking to Develop the Commission's Energy Efficiency Strategic Plan.	FILED PUBLIC UTILITIES COMMISSION JULY 10, 2008 SAN FRANCISCO, CALIFORNIA RULEMAKING 08-07-011
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