



Edison Electric
INSTITUTE

Power by Association

July 11, 2016

Matthew Zogby
Office of the Assistant General Counsel for
Legislation, Regulation, and Energy Efficiency
U.S. Department of Energy (DOE)
1000 Independence Avenue, SW
Washington, DC 20585

Submitted via e-mail to: Regulatory.Review@hq.doe.gov

Re: Regulatory Burden Request for Information, 81 Fed. Reg. 28736 (May 10, 2016)

Dear Mr. Zogby:

The Edison Electric Institute (EEI) is submitting this letter and the enclosed comments in response to the above-referenced request for information (RFI). In the RFI, DOE has asked for input on ways to streamline its regulations and to eliminate unnecessary ones, so as to make the regulations less burdensome and more effective.

EEI filed the enclosed comments focusing on energy efficiency, reporting, and transmission permitting issues in 2011 and 2012, in response to earlier such RFIs. Unfortunately, DOE largely has not responded to those comments.

While some of the concerns EEI raised have been overtaken by events, many of the concerns remain valid, and some new ones have arisen, such as the accuracy of U.S.-energy-mix assumptions in determining energy-efficiency-standard benefits. EEI would appreciate the opportunity to discuss these matters with you and your colleagues in the General Counsel's Office in person at your convenience.

Please let us know if you need any additional information and when we may schedule a time to meet, by contacting me at efisher@eei.org or my colleague Henri Bartholomot at hbartholomot@eei.org. I am sharing copies of this letter with other EEI staff who work on these issues, as they too may participate in the discussion. Thank you.

Sincerely,

A handwritten signature in blue ink that reads "Emily Fisher". The signature is fluid and cursive, with the first name being more prominent.

Emily Fisher
Vice President, Legal

Enclosures

cc: Edward Comer, Vice President, General Counsel and Corporate Secretary
Henri Bartholomot, Associate General Counsel, Regulatory and Litigation
Adam Benshoff, Senior Attorney
Richard Tempchin, Executive Director, Retail Energy Services
Steven Rosenstock, Senior Manager, Energy Solutions
Stephen Frauenheim, Manager, Business Information
Richard Loughery, Director Environmental Activities