

## Manke, Adam P

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**From:** Kristjansson, Sue  
**Sent:** Wednesday, October 14, 2015 12:44 PM  
**To:** Schwecke, Rodger  
**Cc:** Rendler, Daniel  
**Subject:** RE: SoCalGas' Response to DOE NODA

I spoke with Steve today. He reviewed the letter and said that he has no concerns with it. He did mention that we should bolster our argument around the DOE's lack of care with respect to treating warm climates the same as cold climates and ultimately disadvantaging the warm climate states. I take his point but think that the list of concerns in our original comments include that in every bulleted argument to some degree so I am comfortable with our original arguments.

Let me know when you hear back from Dennis. Today is the deadline.

Thanks!

**Sue Kristjansson**  
**Codes and Standards and ZNE Manager**  
**Southern California Gas Co.**  
**Telephone: (213) 244-5535**  
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**Cell: (424) 744-0361**

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**From:** Schwecke, Rodger  
**Sent:** Tuesday, October 13, 2015 8:51 PM  
**To:** Kristjansson, Sue  
**Cc:** Rendler, Daniel  
**Subject:** Re: SoCalGas' Response to DOE NODA

Or John Ellis, he is our FERC guy.

Sent from my iPhone



On Oct 13, 2015, at 8:19 PM, Kristjansson, Sue <[SKristjansson@semprautilities.com](mailto:SKristjansson@semprautilities.com)> wrote:

I will reach out to him.

Thanks!

**Sue Kristjansson**  
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**From:** Rendler, Daniel  
**Sent:** Tuesday, October 13, 2015 8:10 PM  
**To:** Kristjansson, Sue  
**Cc:** Schwecke, Rodger  
**Subject:** Re: SoCalGas' Response to DOE NODA

Steve would be a good person to start with.

Sent from Dan's IPAD

On Oct 13, 2015, at 8:03 PM, Kristjansson, Sue <[SKristjansson@semprautilities.com](mailto:SKristjansson@semprautilities.com)> wrote:

I have not worked with legal on a review. Would Steve Patrick be the best to contact?

Sent from my iPhone

On Oct 13, 2015, at 5:32 PM, "Schwecke, Rodger" <[RSchwecke@semprautilities.com](mailto:RSchwecke@semprautilities.com)> wrote:

FYI

Sue, I think I am ok with the letter, however lets give Dennis some time to comment. Also, who in legal has reviewed? Before we send, legal should sign-off.

Rodger

Sent from my iPhone



Begin forwarded message:

**From:** "Schwecke, Rodger"  
<[RSchwecke@semprautilities.com](mailto:RSchwecke@semprautilities.com)>  
**To:** "Arriola, Dennis ([DArriola@semprautilities.com](mailto:DArriola@semprautilities.com))"  
<[DArriola@semprautilities.com](mailto:DArriola@semprautilities.com)>  
**Cc:** "Lane, Bret ([JLane@semprautilities.com](mailto:JLane@semprautilities.com))"  
<[JLane@semprautilities.com](mailto:JLane@semprautilities.com)>  
**Subject:** FW: SoCalGas' Response to DOE NODA

Dennis,

For your information, attached is our final draft comment letter to DOE with respect to the proposed furnaces rules due tomorrow and the various attachments. As Sue describes below, we did not include a furnace size minimum for a couple reasons. Having a furnace size limit will be part of a separate

compromise path with the stakeholders and we didn't want to deposition AGA or us in those negotiations. Second, the primary issue that we need addressed is for DOE to address our previous comments on their analysis (reiterated in this comment letter). If DOE would address the analysis, the issue of size would become moot as the higher efficiency furnace would not be economically justified for those class of furnaces. These comments were echoed by various other parties.

Also attached is the latest draft of AGA comments to DOE's NODA.

I believe this is the proper approach and we will be working alongside AGA to find a compromise position with the other stakeholders.

Rodger

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**From:** Kristjansson, Sue  
**Sent:** Tuesday, October 13, 2015 4:59 PM  
**To:** Schwecke, Rodger  
<[RSchwecke@semprautilities.com](mailto:RSchwecke@semprautilities.com)>  
**Cc:** Rendler, Daniel <[DRendler@semprautilities.com](mailto:DRendler@semprautilities.com)>; Ayres, Ann <[AAyres@semprautilities.com](mailto:AAyres@semprautilities.com)>; Olson, Gabriel W <[GOlson@semprautilities.com](mailto:GOlson@semprautilities.com)>  
**Subject:** SoCalGas' Response to DOE NODA

Rodger,

Attached are our response documents to the DOE's Notice of Data Availability (NODA) associated with the Residential Furnace Notice of Proposed Rulemaking (NOPR). I've attached the following:

- Cover letter under your signature
- SoCalGas' original summary of concerns
- GTI technical analysis report
- Negawatt technical analysis report
- AGA's draft comment letter to the NODA

Please note, we did not include a size threshold for a few reasons. First; our original comments did not address a need for two separate product classes split by size, second; the DOE has not addressed any of our concerns raised in our response to the NOPR and we believe those concerns are significant enough to warrant reiterating; and third, we do not want to lock SoCalGas into a number that may or may not address all of our customer's needs in the long-term nor do we

want to impact the negotiations the AGA is undertaking with the stakeholder group.

Based on the AGA board meeting there will be three paths of action for the AGA staff. One will be to submit comments reiterating the concerns raised in their original response to the NOPR (AGA's draft comment letter for the NODA attached to this email); second, to work with the stakeholder group (NRDC, ACEEE and Alliance to Save Energy) to attempt a compromise on size threshold for the non-condensing furnace class; and third, to continue to prepare for possible litigation should a compromise not be reached. My understanding is the absolute minimum acceptable size determined by the board of directors was 70,000 Btu/h.

If you are in agreement with this approach for SoCalGas, I will need to have your electronic signature added to the letter and then I will file our comments with the DOE.

Let me know if you have any questions or require any additional information.

Thank you.

**Sue Kristjansson**  
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