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Office of Energy Efficiency and Renewable Energy
United States Department of Energy
Washington, D.C.

RE: Docket #: EERE-2014-BT-STD-0031
Request for Extension of Comment Period

Mr. Cohen, Mr. Cymbalski and Ms Edwards,

Southern California Gas Company (SoCalGas) appreciates the opportunity to participate in the recent Notice of Proposed Rulemaking (NOPR) regarding the Federal minimum standards for residential furnaces.

SoCalGas has been delivering clean, safe and reliable natural gas to its customers for more than 140 years. It is the nation's largest natural gas distribution utility, serving 20.9 million consumers through 5.8 million meters in more than 500 communities. The company's service territory encompasses approximately 20,000 square miles in diverse terrain throughout Central and Southern California, from Visalia to the Mexican border.

California leads the Nation in energy policy and through significant efforts by the Investor-Owned Utilities, is advancing energy-efficiency not only as a way of protecting the environment but also in serving our customers. For more than a decade, SoCalGas has been actively pursuing highly efficient natural gas use by promoting energy-efficiency, driving advancements in natural gas equipment and low emissions technologies as well as investing in advanced technologies in renewable natural gas and distributed generation.

We applaud the Department of Energy's actions in the advancement of energy-efficiency in an effort to create reliability for the consumer while working toward a healthier environment for generations to come. Considering the overwhelming prominence of natural gas as the fuel for furnaces nationwide and the potential impact of this action, we feel compelled to conduct a thorough analysis of the proposed Rule on behalf of our nearly 21 million customers.

We have completed a very cursory assessment of the information surrounding the rule and the results have led us to conclude that we must undertake a far more in-depth analysis of the DOE's life cycle cost analysis using Oracle's Crystal Ball software. Our initial attempts to do this were unsuccessful due to repeated failure of the software coupled with the complexity of the data. The DOE enjoyed a significant period of time to conduct the analysis that led to this rule and SoCalGas respectfully requests that we be afforded an extension of the comment period for an additional 90 days – from June 10, 2015 to September 10, 2015. This extension will give us the time to correct issues with the software and run scenarios to assess the LCC analysis on behalf of our customers. Nearly 21 million consumers are relying on SoCalGas to ensure that this rule is fair and equitable, cost effective and realistic in its objectives.

Again we appreciate the DOE for continuing to strive toward a more energy-efficient future and we look forward to continued collaboration on that front. We thank you for considering our request for an extension of the comment period to allow us to represent our customers to the best of our ability.

Please do not hesitate to contact us with any additional questions.

Respectfully,

Daniel J. Rendler

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Director, Customer Programs and Assistance
SoCalGas