



October 14, 2015

Ms. Brenda Edwards, EE-41
Office of Energy Efficiency and Renewable Energy
Energy Conservation Program for Consumer Products
U.S. Department of Energy
1000 Independence Avenue, SW.
Washington, DC 20585-0121

Docket Number: **EERE-2014-BT-STD-0031**
RIN: **1904-AD20**

Dear Ms. Edwards:

This letter comprises the comments of the Pacific Gas and Electric Company (PG&E) in response to the Department of Energy (DOE) Notice of Data Availability (NODA) for Energy Conservation Standards for Residential Non-weatherized Gas Furnaces (NWGFs) published September 14, 2015.

Pacific Gas and Electric Company, incorporated in California in 1905, is one of the largest combination natural gas and electric utilities in the United States. Based in San Francisco, the company is a subsidiary of PG&E Corporation. There are approximately 20,000 employees who carry out Pacific Gas and Electric Company's primary business—the transmission and delivery of energy. The company provides natural gas and electric service to approximately 15 million people throughout a 70,000-square-mile service area in northern and central California. We understand the potential of efficiency standards to cut costs and reduce consumption while maintaining or increasing consumer utility of the products. We have a responsibility to our customers to advocate for standards that accurately reflect the climate and conditions of our respective service areas, so as to maximize these positive effects.

We appreciate the opportunity to provide comments to DOE for this most recent NODA. We support DOE continuing to refine their analysis and making it available for public comment in this NODA. We will be filing a letter on the docket in a few weeks in which we will make detailed recommendations. We are engaging with stakeholders in an effort to find a consensus compromise and need more time to fully explore the issues and identify the options.

Sincerely,

A handwritten signature in black ink, appearing to read 'Patrick Eilert', written in a cursive style.

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