

**From:** [Eilert, Patrick L](#)  
**To:** [Anderson, Mary](#)  
**Subject:** email  
**Date:** Friday, June 03, 2016 9:37:21 AM

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Please take a quick look at this Mary.

Vincent/Karen/Jessica-

I am writing to highlight DOE activity on gas measures. (Jessica, we are doing this in response to discussions with Nick last year after AGA reached out to him regarding PG&E's advocacy position on gas furnaces. In particular, Nick asked that we avoid surprising AGA. Additionally, SCG's position on gas efficiency is often different from that of PG&E's. We are trying to stay ahead of potential feedback from either AGA or SCG to higher levels of our organization.) Mary is meeting regularly with AGA and proactively coordinating with SCG .

The Department of Energy (DOE) is working on four gas rulemakings: a) commercial package boiler test procedure, b) commercial package boiler standard, c) commercial water heater test procedure, and commercial water heater standards.

- Commercial Package Boiler Test Procedure – The IOUs have submitted comments generally supporting DOE with thoughtful recommendations on the potential changes to the DOE proposed test procedure. The recommendations were based upon boiler testing that was completed by PG&E ATS. SCG supported the position and signed onto the letter. AGA is supportive of PG&E's position and has copies of the ATS boiler testing results.
- Commercial Package Boiler Standard – The IOUs are beginning to work out our positions on this rulemaking. PG&E is generally supportive of the DOE position which increases efficiency and allow both condensing and non-condensing boilers in the market. Since only three percent of businesses in California have boilers, it is expected that the small incremental increase in efficiency will have a minimal impact on the gas usage in CA. We haven't yet communicated our position to AGA or SCG, but we will be meeting with them each next week to discuss our initial position.
- Commercial Water Heater Test Procedure and Standard – DOE is holding a public meeting on June 6th. SCG is leading the IOU comment letters for these two rulemakings. Marshall and Mary will be working on this to vet the comment letter and research our position. They will communicate with AGA and SCG our positions and the research informing our positions. This is an important proceeding and we will provide information on the potential impact on PG&E as we learn more.

As the rulemakings continue we will provide updates on the positions we are considering and our outreach to other natural gas stakeholders. Please let us know if you have any questions.

DOE appears to have ceased activity on gas furnaces for the time being. We haven't heard anything new for a few months.

Thanks.

Pat