

**From:** [Eilert, Patrick](#)  
**To:** [Kristjansson, Sue](#); "[Michelle Thomas \(Michelle.Thomas@sce.com\)](#)"; [Zeng, Kate](#)  
**Cc:** [Zelmar, Karen](#); [Dewey, Meghan](#)  
**Subject:** RE: IOU Comment Letter to DOE  
**Date:** Thursday, July 13, 2017 4:32:38 PM

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Sue/Michelle/Kate-

Just getting to this now since I have been in meetings all day and there were numerous changes to consider.

We appreciate receiving SoCalGas's additional comments on the RFI letter. PG&E has a few overarching comments on SCG's most recent version of the letter, and recommends separate letters.

- Although the Appliances team spent a significant number of hours (and iterations) over the last month preparing and reviewing the previous version of the letter, SCG's most recent update is a significant departure. PG&E believes there are too many differences to resolve before tomorrow's deadline.
- The tone of SoCalGas's letter does not represent our historical position on federal standards and is more critical than PG&E believes is warranted. It isn't sufficiently supportive of the program and work that has been completed over the last decade.
- The IOUs have worked closely with the CEC on the comments and the CEC is supportive of the previous version of the comment letter. The IOU team had shared previous comments on the LCC analysis with the CEC and the CEC was not supportive of including the LCC comment. PG&E is not comfortable challenging the CEC on this issue.
- PG&E shared a copy of the previous version of the letter with the MA utilities (including gas utilities) and they will be submitting a very similar letter. PG&E is not comfortable dramatically modifying the current letter after working with the MA utilities to provide comments.
- Two of the California IOUs have already submitted approvals and PG&E received approval from our DC office to submit the original letter.

As the IOUs have worked through comments over the last month there was an explicit agreement that the IOUs can submit separate RFI comment letters since there may be different policy stances on the RFI questions. While the previous version is not perfect, PG&E believes it already embodies compromises worked out by the Appliances subprogram team. We are comfortable with SoCalGas (and other IOUs) sending separate letters.

Would you support a managers +1 meeting in the near future to discuss the process for developing future federal appliance letters?

Thank you.

Pat

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**From:** Kristjansson, Sue [mailto:SKristjansson@semprautilities.com]  
**Sent:** Wednesday, July 12, 2017 3:24 PM  
**To:** Eilert, Patrick; 'Michelle Thomas (Michelle.Thomas@sce.com)'; Zeng, Kate  
**Subject:** IOU Comment Letter to DOE

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Good afternoon managers,

Based on conversations I had with each of you we've modified the comment letter to reflect a more measured response to the DOE's inquiry. I see their RFI as an opportunity for us to shape where we want them to go and if we simply agree with all that has been in the past we run the risk of this administration eliminating EERE altogether (that is up for discussion and has some support). It behooves us to come up with valid and reasonable recommendations for improvement so that we can get through the next years and beyond.

I will note that we added the element of the furnace rule methodology and although I mentioned that we may be willing to remove that from the main letter with all four IOU's, I'm not sure that my upper management is supportive of that offer, they are still reviewing and feel that is an important element for us. Note that we are not requesting that the DOE throw out the Monte Carlo method, just conduct a review of how it interacts with the different measures that are considered and have a good peer review of the result to ensure we don't end up where we did with the furnace rule. I think it's a reasonable request.

Please review the attached revised (redline) version to see if we are able to find common ground and sign on together as the four California IOU's. If you could review as quickly as possible and get back to me, we are low on time with the comments due on Friday.

Thanks!

***Sue Kristjansson***

***Codes & Standards and ZNE Manager***

SoCalGas

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