   

October , 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), Southern California Gas Company (SCGC), San Diego Gas and Electric (SDG&E), and Southern California Edison (SCE) in response to the Department of Energy (DOE) Notice of Data Availability (NODA) for Energy Conservation Standards for Residential Furnaces.

The signatories of this letter, collectively referred to herein as the California Investor Owned Utilities (CA IOUs), represent some of the largest utility companies in the Western United States, serving over 35 million customers. As energy companies, 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 the following recommendations in response to the DOE request for comments for this energy conservation standard NODA. We commend DOE for updating the energy conservation standard for Residential Furnaces. We urge DOE to consider the following recommendations:

1. **We support a single strong energy conservation standard for all Residential Furnace equipment.**

In DOE’s NODA for Residential Furnaces, a cutoff creating a “small furnace definition” (between 45 MBtu/h and 65 MBtu/h) is being considered which would exempt smaller furnaces from being required to meet the new energy conservation standard. In California, there are many existing furnace installations that have capacities below the thresholds being considered in the NODA. New dwellings being built to stringent California Building Energy Efficiency Standards (often referred to as Title 24) require even smaller capacity furnaces. This is due to the state’s mild climate. By exempting these furnaces from a higher standard, potential energy savings will not be realized. Thus California IOUs support a single size classification with an energy conservation standard that requires condensing furnace technology.

1. **If DOE decides to adopt the proposed capacity based, 2 tier standard we support 45 MBtu/h as the cutoff in order to capture the maximum possible savings.**

Despite our concerns about the possible decision to split furnaces into two size categories, we recognize that this compromise position is important to many of the proceeding’s stakeholders. Therefore, we would strongly recommend a cutoff of 45 MBtu/h for condensing and noncondensing furnaces, the lowest size analyzed by DOE. As mentioned above, this is due to the tendency for California furnaces to be sized smaller than the national average. We prefer the smallest cutoff that DOE has considered.

1. **If a dual capacity standard is chosen, we support 95 AFUE for equipment above the chosen capacity threshold.**

The analysis provided by DOE indicates that the energy conservation standard which results in the best combination of national energy savings and Net Present Value to consumers is 80/95 (small/large) AFUE. It is for that reason that the California IOUs support a 95 AFUE energy conservation standard for large furnaces.

In conclusion, we would like to reiterate our support to DOE for strengthening the energy conservation standard for Residential Furnaces. We thank DOE for the opportunity to be involved in this process and encourage DOE to carefully consider the recommendations outlined in this letter.

Sincerely,

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