

Manke, Adam P

From: Kristjansson, Sue
Sent: Tuesday, October 13, 2015 4:59 PM
To: Schwecke, Rodger
Cc: Rendler, Daniel; Ayres, Ann; Olson, Gabriel W
Subject: SoCalGas' Response to DOE NODA
Attachments: DOE Furnace NODA Cover Letter.doc; DOE Furnace NOPR Comments.pdf; GTI Analysis.pdf; Negawatt Analysis.pdf; Rough Draft 7 AGA Comments on DOE NODA on Residential Furnaces.doc

Rodger,

Attached are our response documents to the DOE's Notice of Data Availability (NODA) associated with the Residential Furnace Notice of Proposed Rulemaking (NOPR). I've attached the following:

- Cover letter under your signature
- SoCalGas' original summary of concerns
- GTI technical analysis report
- Negawatt technical analysis report
- AGA's draft comment letter to the NODA

Please note, we did not include a size threshold for a few reasons. First; our original comments did not address a need for two separate product classes split by size, second; the DOE has not addressed any of our concerns raised in our response to the NOPR and we believe those concerns are significant enough to warrant reiterating; and third, we do not want to lock SoCalGas into a number that may or may not address all of our customer's needs in the long-term nor do we want to impact the negotiations the AGA is undertaking with the stakeholder group.

Based on the AGA board meeting there will be three paths of action for the AGA staff. One will be to submit comments reiterating the concerns raised in their original response to the NOPR (AGA's draft comment letter for the NODA attached to this email); second, to work with the stakeholder group (NRDC, ACEEE and Alliance to Save Energy) to attempt a compromise on size threshold for the non-condensing furnace class; and third, to continue to prepare for possible litigation should a compromise not be reached. My understanding is the absolute minimum acceptable size determined by the board of directors was 70,000 Btu/h.

If you are in agreement with this approach for SoCalGas, I will need to have your electronic signature added to the letter and then I will file our comments with the DOE.

Let me know if you have any questions or require any additional information.

Thank you.

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