

From: [Hunt, Marshall](#)
To: [Eilert, Patrick L](#)
Subject: RE: SCG
Date: Thursday, July 02, 2015 4:23:36 PM

Pat

SCG actions:

- [Filed letter with DOE without informing SW team](#)

Without informing PG&E, SCG filed a letter with DOE in support of the AGA request for a month long extension of the furnace standards comment period. DOE staff privately conveyed concern about this break with the long standing, united stance taken by the CA IOUs.

- [Chose to not join in a SW investigation of Furnace cost effectiveness](#)

DOE found that condensing gas furnaces (AFUE 92) are life cycle cost effective (LCC) for the USA and should be set as the new efficiency standard. SCG from the beginning joined AGA, PAGA, and AHRI in opposing the finding. PG&E initiated a review of the DOE analysis and held several review sessions with the SW C&S team. The offer to continue to work together was rejected. SCG stated that they had hired a consulting firm to do analysis and would not be sharing results with the SW team. They have chosen to not be involved in the work by energy efficiency advocates to explore possible areas of compromise with AGA. In every efficiency rule making the CA C&S team works with national EE advocates to develop a coordinated position while filing our own CA centric letter. Additional work by PG&E has found that the DOE LCC is conservative for CA.

- [Opposed setting the 2016 Title 24 water heating budget lower with IWH](#)

The gas instantaneous or tankless water heater (IWH) is cost effective in new construction and has been adopted (June 10, 2015) as the basecase for setting the water heating budget. The Codes and Standard Enhancement (CASE) study developed under the direction of PG&E for the SW team was made final and docketed. Storage tank water heater options were developed in response to SCG. Then despite having their logo on the CASE report, SCG opposed the measure. Signing on to the CASE study and then opposing it is not logical. In addition, it erodes the IOUs SW team in the eyes of the CEC and can lend support to those who want to moving funding away from IOUs.

- [Taken the position that short term gas customer benefits come before EE State Policy and LCC benefits](#)

CA IOU Codes & Standards program is charged with working to develop and have

adopted all LCC measures in support of customer energy and dollar savings, and to support of State Carbon and Climate Action policy. In various meetings SCG has taken the position that this is secondary to “what is best for their customers”. This is what PG&E EE 2.0 does but in contrast we support our customers with implementing codes changes that have positive LCC benefits. Also, PG&E takes seriously the state policy goals set forth by the CPUC, CEC, and Governor.

This will need some more work. The underlined are the bullets.

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From: Eilert, Patrick L
Sent: Thursday, July 02, 2015 2:57 PM
To: Hunt, Marshall
Subject: SCG

Would be good to get a few bullets from regarding SCG’s stand on standards.

Thank you.

Pat Eilert

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