

From: [Anderson, Mary](#)
To: [Hunt, Marshall](#); [Eilert, Patrick L](#)
Subject: RE: Next Draft Status of DOE Furnace Rule Making
Date: Wednesday, October 07, 2015 9:10:18 AM

From: Hunt, Marshall
Sent: Tuesday, October 06, 2015 10:39 AM
To: Eilert, Patrick L; Anderson, Mary
Subject: Next Draft Status of DOE Furnace Rule Making

Pat and Mary

This is a draft of my next email to Jan and Karen. Please review and edit as needed. I am remembering that Nick has a meeting with AGA in mid-October so we should get this off this week.

Jan and Karen

As noted in my email of sent September 24th this is an update on present status of the DOE Furnace Standard rule making.

1. PG&E is working on a Statewide IOU C&S Team comment letter and have set up two SW meetings to discuss the comments. The attached draft was sent for review Friday.
2. ACEEE has released a draft of their comments which are very close to ours. The difference between our position is XXX.
3. SCG has indicated that their position is very different from PG&E's but has not let the SW IOU team know their exact position We have asked for a clarification on their position and they haven't responded yet.
4. An EE advocate meeting was scheduled on Wednesday September 30th in Washington DC but didn't occur. PG&E was prepared to participate in this meeting.
5. In an effort to mitigate the concerns Nick brought up the capacity based 2 Tier standard has been edited to be XX. This meets the energy efficiency goals and Nick's goals to minimize negative impacts on natural gas distribution companies.

Please do not hesitate to contact me if you want more information. This compromise would not have happened if we and other EE advocates had not supported the DOE 92 AFUE standard.

Thank you for your attention to this important issue.

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From: Hunt, Marshall
Sent: Thursday, September 24, 2015 4:39 PM
To: Berman, Janice S; Zelmar, Karen
Cc: Eilert, Patrick L; Anderson, Mary

Subject: Status of DOE Furnace Rule Making

Jan and Karen

This is the present status of the DOE Furnace Standard rule making.

1. Congress forced DOE to consider the AGA, NRDC, and ACEEE capacity based 2 Tier Standard.
2. While there may be some dissenters, AGA is in support of the compromise although the capacity level may go up from 55k BTUh. PG&E C&S team would like the capacity level as low as possible.
3. Advocating for a 95 AFUE for large furnaces (>55 kBTUh) and 80 AFUE for small furnaces is the best value for the nation and will work for California. Compared to the 92 single standard this would increase by 160% the Quads saved and increase the net present value by 210%, which is larger than expected. The higher energy savings are due to the assumption that there will be a reduction in fuel switching (from gas to electric). This isn't an issue for California compared to non-CA utilities, especially in the Southeast.
4. PG&E is working to have a Statewide IOU C&S Team comment letter. A draft will be out for review Friday. SCG has committed to let the SW IOU team know their position by the end of the week.
5. There is a potential meeting of EE advocates next Wednesday in Washington DC at which time we will know more. I will already be in DC and will attend the meeting. I recommend that an update be sent to Nick on the 7th with the latest information for his use with AGA colleagues.

Please do not hesitate to contact me if you want more information. This compromise would not have happened if we and other EE advocates had not supported the DOE 92 AFUE standard.

Thank you for your attention to this important issue.

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