

SOUTHERN CALIFORNIA GAS COMPANY
ADOPTION OF ITS ENERGY EFFICIENCY ROLLING PORTFOLIO
BUSINESS PLAN AND RELATED RELIEF
(A.17-01-016)
(DATA REQUEST ORA-A1701013-SCG004)

Department of Energy (DOE) Request for Information (RFI) on Executive Order 13771

QUESTION 1:

Provide all documents (draft and final) and all emails relating to DOE Rulemaking DOE_FRDOC_0001-3375, DOE's RFI pertaining to its implementation of Executive Order 13771 Reducing Regulation and Controlling Regulatory Costs.

RESPONSE 1:

SoCalGas objects on the basis that this question is vague, overbroad, and unduly burdensome. SoCalGas further objects to the production of the requested information to the extent and on the grounds it is confidential and protected from disclosure by the attorney-client privilege, the attorney work product doctrine, and other applicable privileges and protections. Subject to and without waiving these objections, SoCalGas responds as follows:

Please see attachments for all documents and emails relating to the DOE's RFI pertaining to its implementation of Executive Order 13771 Reducing Regulation and Controlling Regulatory Costs attached in Response_1.zip. This attachment is compiled in the following folders:

- Response_1_Docs: Draft and Final Documents
 - PGE_Provided_DraftFinalLetters: Draft Joint IOU letter led by PG&E
 - SCG_Draft_Final_Docs: SoCalGas draft and final letters
- Response_1_Emails: emails regarding rulemaking comments filed documents
- [CONFIDENTIAL] Response_1_Protected Information.zip, provided pursuant to Pub. Util. Code §583 and all applicable protections, and accompanied by Declaration.

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QUESTION 2:

Provide the date that the final letters were docketed to DOE and the docketed comment letters.

RESPONSE 2:

The final comment letter was docketed on July 14th, 2017 to the DOE, DOE_FRDOC_0001-3375, regarding the RFI on Executive Order 13771.

Please see FR-2017-05-30 DOE RFI SoCalGas Response.pdf within Response_2.zip as the copy of SoCalGas' final comment letter.

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DOE Residential Furnace Rulemaking

QUESTION 3:

Provide all documents (draft and final) and emails regarding DOE's Residential Furnace rulemaking since January 1, 2014 in any phase of the rulemaking.

RESPONSE 3:

SoCalGas objects on the basis that this question is vague, overbroad, and unduly burdensome. SoCalGas further objects to the production of the requested information to the extent and on the grounds it is confidential and protected from disclosure by the attorney-client privilege, the attorney work product doctrine, and other applicable privileges and protections. Subject to and without waiving these objections, SoCalGas responds as follows:

Please see attachments for all documents and emails relating to the DOE's Residential Furnace rulemaking, EERE-2014-BT-STD-0031, attached in Response_3.zip. This attachment is broken down into the following folders:

- 010917_R3: Documents (Draft and Final) for comments filed 01/09/17
- 051215_R3: Documents (Draft and Final) for comments filed 05/12/15
- 071415_R3: Documents (Draft and Final) for comments filed 07/14/15
- 101615_R3: Documents (Draft and Final) for comments filed 10/16/15

- Response_3_Emails: emails regarding rulemaking comments filed Documents

- [CONFIDENTIAL] Response_3_Protected Information.zip, provided pursuant to Pub. Util. Code §583 and all applicable protections, and accompanied by Declaration.

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QUESTION 4:

Provide any analysis completed in response to these rulemakings.

RESPONSE 4:

SoCalGas objects on the basis that this question is vague and overbroad. Subject to and without waiving these objections, SoCalGas responds as follows:

Please see attachments for the analysis completed in response to the DOE Residential Furnace rulemaking attached in Response_4.zip and Response_4_071415_R4_LCC calcs.zip. Analysis documents have been grouped based on the date comments were docketed as indicated in Response 3.

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QUESTION 5:

Provide the dates of all comment letters submitted to DOE and all docketed comment letters or data.

RESPONSE 5:

The following table provides dates for all comment letters submitted to DOE. These final docketed comments and documents are provided in Response_5.zip filed corresponding to the date the comments have been posted.

Date Posted	Link & Attachment Names
01/09/2017	<p>Link: https://www.regulations.gov/document?D=EERE-2014-BT-STD-0031-0304</p> <p>Attachment Names:</p> <ul style="list-style-type: none"> • "SoCalGas Attch 02_GTI Analysis" • "SoCalGas Attch 01_Negawatt DOE Furnace SNOPR updated report 20161220" • "DOE Residential Furnace SNOPR - SoCalGas Comments 20160106"
10/16/2015	<p>Link: https://www.regulations.gov/document?D=EERE-2014-BT-STD-0031-0177</p> <p>Attachment Names:</p> <ul style="list-style-type: none"> • "DOE Furnace NODA Cover Letter" • "DOE Furnace NOPR Comments" • "GTI Analysis - 21779 Furnace NOPR Analysis Final Report 2015-07-15" • "Negawatt Analysis"
07/14/2015	<p>Link: https://www.regulations.gov/document?D=EERE-2014-BT-STD-0031-0132</p> <p>Attachment Names:</p> <ul style="list-style-type: none"> • "DOE Furnace NOPR Cover Letter" • "DOE Furnace NOPR Comments" • "GTI Analysis (includes privately owned rights disclaimer)" [see 10/16/15] • "CA LCC Tables" [two files] • "CA Switching Table" [two files]

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	<ul style="list-style-type: none"> • “Negawatt Analysis” • “21779 Furnace NOPR Analysis Final Report 2015-07-15”
05/12/2015	<p>Link: https://www.regulations.gov/document?D=EERE-2014-BT-STD-0031-0051</p> <p>Attachment Names:</p> <ul style="list-style-type: none"> • “SoCalGas Request for Extension to Comment Deadline for Furnace Rule”

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DOE Rulemaking Non-Response or Non-Support

QUESTION 6:

Provide a list of all DOE rulemakings where you either did not comment on the proposed efficiency level or did not support DOE's proposed efficiency level (Trial Standard Level or TSL) or a higher efficiency level (TSL).

RESPONSE 6:

SoCalGas objects on the basis that this question is vague, overbroad, and unduly burdensome. Subject to and without waiving these objections, SoCalGas responds as follows:

Below please find the DOE rulemakings where SoCalGas did not support the proposed efficiency level:

- Energy Conservation Standards for Commercial Packaged Boilers - EERE-2013-BT-STD-0030
- Energy Conservation Standards for Residential Furnaces - EERE-2014-BT-STD-0031
- Energy Conservation Standards for Residential Conventional Cooking Products - EERE-2014-BT-STD-0005

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QUESTION 7:

Describe your rationale for not commenting on or for not supporting DOE's proposed efficiency level (TSL) for all rulemakings responsive to Question 6.

RESPONSE 7:

SoCalGas submitted comments to each of the rulemakings listed in question six. The following rationales have been provided below for each of the rulemakings.

SoCalGas provided comments in the DOE Rulemaking for the Energy Conservation Standards for Commercial Packaged Boilers proposing TSL 2, EERE-2013-BT-STD-0030. SoCalGas' provided rationale that supported TSL 1 instead of the proposed TSL given the concern that the DOE may be inadvertently disqualifying a significant amount of non-condensing equipment. Due to the upcoming changes to the commercial packaged boiler test procedure some cases may be forcing a shift to condensing equipment. Additionally, SoCalGas was concerned that the proposed ruling places an undue burden on California customers in particular. Final comments are docketed in <https://www.regulations.gov/document?D=EERE-2013-BT-STD-0030-0077>. [A copy of these comments](#). A copy of these comments (SoCalGas_Response_to_Com_Pkg_Boilers_Std_2016-06-22k.pdf) are provided in Response_7.zip.

In DOE Rulemaking for the Energy Conservation Standards for Residential Furnaces, EERE-2014-BT-STD-0031, SoCalGas did not support the DOE's proposed TSL 6. The analysis that was conducted showed that even with the split standard, it continues to be an economic hardship on Southern California customers. SoCalGas submitted two sets of analyses to the original NOPR that provided a comprehensive evaluation of the underlying inputs, assumptions and methods of DOE's life cycle cost (LCC) analysis and data filtered by region (California and Southern California). SoCalGas had also conducted a second analysis based on the updated LCC calculations and associated technical support document (TSD) released with the SNOPR. SoCalGas requested the DOE to review the summary of our findings and address all concerns with the TSD and LCC prior to issuing a final rulemaking. Final comments/documents are docketed in <https://www.regulations.gov/document?D=EERE-2014-BT-STD-0031-0304>. These comments are provided in Reponse_5.zip in folder 010917_R5.

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In DOE Rulemaking for the Energy Conservation Standards for Residential Conventional Cooking Products, EERE-2014-BT-STD-0005, the Southern California IOUs (SoCalGas, San Diego Gas & Electric and Southern California Edison) did not support the DOE's proposed TSL 2. The SoCal IOUs reviewed all product classes within the DOE proposed trial standard level TSL 2 and found all calculations and rationale for each to be reasonable, with the exception of Product Class 3 (gas cooking tops). To resolve this while maintaining the viability of commercial-style features, we supported TSL 2 but with efficiency level (EL) 0 for Product Class 3. Final comments are docketed in <https://www.regulations.gov/document?D=EERE-2014-BT-STD-0005-0067>. A copy of these comments (SoCal_IOU_Res_Cooking_Products_Std_Comment_Letter_20161102.pdf) are provided in Response_7.zip.