Exhibit #	Data Request	File Name	Description
01	**ORA-A1701013-SCG004**	**<ORA-A1701013-SCG004>**	**SoCalGas Response to ORA Data Request SCG 004.**
02	**ORA-A1701013-SCG004**	<RE_LCC Considerations DOE Furnace Proceedings>	Email between SoCalGas and PG&E in Feb-March 2015 timeframe regarding DOE Furnace Rule proceeding.
03	**ORA-A1701013-SCG004**	<031215_A>	Emails between SoCalGas and GTI regarding analyzing impact of Furnace Rule on fuel-switching and impact to customers.
04	**ORA-A1701013-SCG004**	<032715_A>	Internal SoCalGas communication describing status of position on Furnace Rule as of March timeframe, stating continued support for higher efficiency levels in natural gas appliances and equipment and its first priority to assess the impact to SoCalGas customers.
05	**ORA-A1701013-SCG004**	<072815_A>	Internal SoCalGas communication containing a proposed note in response to PG&E's question on SoCalGas' position on Furnace Rule as of late July 2015.
06	**ORA-A1701013-SCG006**	**<ORA-A1701013-SCG006>**	**SoCalGas Response to ORA Data Request SCG 006.**
07	**ORA-A1701013-SCG006**	<041217_A>	Emails between SoCalGas and PG&E in mid-April 2017 discussing status of pending CASE Report, with discussion of SoCalGas inquiring into status.
08	**ORA-A1701013-SCG006**	<042417_A>	Emails with consultant, Negawatt, in late-April 2017 on status of work on measure.
09	**ORA-A1701013-SCG006**	<050417_A>	Email from Negawatt in early-May 2017 inquiring of SoCalGas whether additional information was provided by PG&E.
10	**ORA-A1701013-SCG006**	<051517_17>	Email from SoCalGas to PG&E in mid-May 2017 inquiring about status of information of tub spout diverters.

11	**ORA-A1701013-SCG006**	<051617_A>	Email between Negawatt and SoCalGas in mid-May 2017 regarding review of CEC presentation and statement that SoCalGas was still waiting for information from PG&E.
12	**ORA-A1701013-SCG006**	<051817_A>	Emails between PG&E and SoCalGas in mid-May 2017 stating Energy Source has not completed the analysis on the tub spout diverters.
13	**ORA-A1701013-SCG006**	<052217_C>	Emails between Negawatt and SoCalGas in late-May 2017 discussing review of PG&E attachments and possible additional lab work.
14	**ORA-A1701013-SCG006**	<052317_B>	Emails between PG&E and SoCalGas in late-May 2017 regarding SoCalGas taking the lead.
15	**ORA-A1701013-SCG006**	<061517_A>	Internal SoCalGas emails, and emails with NRDC in mid-June 2017 regarding NRDC's interest in tub spouts.
16	**ORA-A1701013-SCG006**	<062317_C>	Email reply from PG&E stating that "none of the other IOUs expressed concern" about SoCalGas' plan to not respond to the initial request.
17	**ORA-A1701013-PGE006**	<020215>	Example of other IOUs' collaboration with organizations and consultants.
18	**ORA-A1701013-PGE006**	<021215>	Example of other IOUs' collaboration with organizations and consultants.
19	**ORA-A1701013-PGE006**	<061915>	Example of other IOUs' collaboration with organizations and consultants.

Exhibit 01 - ORA-A1701013-SCG004
<ORA-A1701013-SCG004>

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.

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)

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.

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)

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.

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)

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.

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)

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	**Link**: https://www.regulations.gov/document?D=EERE-2014-BT-STD-0031-0304 **Attachment Names**: • "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	**Link**: https://www.regulations.gov/document?D=EERE-2014-BT-STD-0031-0177 **Attachment Names**: • "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	**Link**: https://www.regulations.gov/document?D=EERE-2014-BT-STD-0031-0132 **Attachment Names**: • "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]

	• "Negawatt Analysis" • "21779 Furnace NOPR Analysis Final Report 2015-07-15"
05/12/2015	**Link**: https://www.regulations.gov/document?D=EERE-2014-BT-STD-0031-0051 **Attachment Names**: • "SoCalGas Request for Extension to Comment Deadline for Furnace Rule"

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)

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

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)

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 Repsonse_5.zip in folder 010917_R5.

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)

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_Stds_Comment_Letter_20161102.pdf) are provided in Response_7.zip.

Exhibit 02 - ORA-A1701013-SCG004
<RE_LCC Considerations DOE Furnace Proceedings>

From:	Kristiansson, Sue
To:	Hunt, Marshall
Cc:	Eilert, Patrick L
Subject:	Re: LCC Considerations DOE Furnace Proceedings
Date:	Sunday, March 01, 2015 5:55:00 PM

Hi Marshall,

I just sent you a note regarding the working group. I'm looking forward to it.

I do feel the need to address one concern about the meeting held last Friday. Being new I wasn't aware that it was even happening and I'm not sure what stakeholders were present but I was a little surprised to learn that you were presenting on behalf of all of the IOU's on the agenda. I'm sure this was a simple oversight on the part of NRDC when they developed the agenda but we (SoCalGas) haven't finalized our assessment of the furnace rule and all of the technical elements yet. As we discussed on the phone, there is probably no negative impact to our customers here in California and I'm sure fuel switching is a non-issue for us but we really want to do our own analysis first to determine that. You may have mentioned this at a Statewide meeting that I, of course, was not at but if you could do me a favor in the future and let me know if you're asked to speak on behalf of all of the IOU's? I think it is important to have consensus prior to discussing with outside stakeholders.

Also, do you happen to have a list of who was all in the room or on the call for this meeting? The information I received did not have an attendee list.

Thanks!

Sue

Sent from my iPad

On Feb 20, 2015, at 10:05 AM, "Hunt, Marshall" <MBH9@pge.com> wrote:

> This is what I sent to the NRDC sponsored, informal stakeholders meeting held in DC today at 6:30 am our time. I wanted to have people give the DOE LCC analysis the attention it deserves.
>
> I recommend that we use this issue to demonstrate how the Statewide Team works together to fully explore the issues. Thus I request that we form a working group to explore in depth the LCC. It is set up to allow the analysis of different scenarios so that the impacts can be accessed. I have Yanda Zhang and Bitik Kundu supporting the effort so that we get the technical analysis we need to fully assess the impact on California. We are 10.5% of the national market and unlike other areas gas furnace heating is the overwhelming choice of consumers. This rule making will not take effect until 2021 at the earliest so that I believe that impacts on voluntary Products and Programs are not the issue. The issue is cost effective energy conservation for the benefit of California rate payers. This is what the CPUC funds us to do.
>
> There is already outside pressure from the AGA and AHRI against the DOE proposal which is of course fine but we need to advocate for our customers. California does not have some the issues such a fuel switching and basement installations that are of concern elsewhere in the USA.
>
> I look forward to working diligently on the issue.
>
>
> Marshall B. Hunt
> Professional Mechanical Engineer
> Codes & Standards
> Pacific Gas & Electric Company
> 415-260-7624

> mbh9@pge.com
>
>
> _____
> From: Eilert, Patrick L
> Sent: Thursday, February 19, 2015 4:49 PM
> To: 'Craig Tyler (craigtyler@comcast.net)'; Fernstrom, Gary; Anderson, Mary; Caudle, Sylvester Ron; Eilert, Patrick L; Elliott, Ed; Evans, Matthew; Goff, Chris (Industrial Mkts) (CGoff@semprautilities.com); Higa, Randall; Hunt, Marshall; Kim, Charles; Kristjansson, Sue; Mariscal, Javier; Marver, Jill; Salas, Adrian; Shushnar, Gary; Tartaglia, Stuart; Willmore, Lovell
> Subject: Statewide IOU C&S Conference Call : February 20
>
>
> Tomorrow's Starting Point…Please add.
>
>
> PGE – Pat
> SCG –
> SCE –
> SDGE –
>
> Coordination
> - EM&V
> Response to Recommendations from 2010-12 Impact Evaluation
>
> - Data Requests
> Missing information from Data Requests 1 (EEStats 17542/EMV 40) and 2 (EEStats 17546/EMV 41)
> - Attribution values for standards compiling the 2013-2014 estimates.
> - Updated parameters for CASE studies to support the 2013-2014 savings estimates.
>
> - Communications with Paula
>
> - PPMs
> Status of Updates
>
> -Request from DOE on ZE buildings
>
> - Recent meetings
> Water topics (CALGreen, February 5)
> AHRI meeting to discuss RTU (DC, February 5)
> DOE meeting to discuss commercial HVAC and water heating (DC, February 6)
> Building Codes and Reach Codes Planning (SF, February 9)
> Appliance Standards Planning (SF, February 10)
> WO 32 related lab testing (Irwindale, February 10)
> Small Motors meeting (NEMA Negotiation, February 24)
> HERS (RESNET Building Perf Conference) – February 16, 17, and 18th (San Diego)
>
> - Upcoming Meetings
> CALBO business meeting (Monterey, March 2-5)
> Computers Workshop (March 9)
> CEC RFI for HERS Program (Staff Webinar, March 10)
> Q1 Statewide Meeting (Irwindale, March 9-11)
> Continuation of Subprogram Planning (March 9)
> Business Meeting (March 10)
> Paula Meeting (March 11)
> Appliance Standards Public Hearing (CEC, March 17)
>

> AB 213 –
>
> Contracts
> Federal Standards Contract
>
> Building Codes
> - 45-day language
> - Lighting retrofits loophole
> - Gas availability
> - Battery charger trade-offs when combined with PV.
> - CALGreen ZNE tier, and gaps with T-24 part 6 for lighting.
> - Flex ducts controversy
> - ACM issues and a good algorithm for modeling ductless systems.
>
> Appliance Standards
> - Title 20
> 45-day language (water topics, labeling, etc.) under review
> Faucets (1.5 gpm versus 1.0) (wait time, legionella)
> How to respond to CEC language generally, e.g., federal alignment
> MH added – staff recommends adopt federal levels, or risk missing deadline
> Computers and displays staff report next week
> Assessment on Monday
>
> -Federal
> ESI Process and number of activities (placeholders upon notice?)
> Furnaces
>
> Compliance Improvement
> -
>
> Reach Code
> -
>
>
>
>
>
> Thank you.
> Pat Eilert
>
> PG&E | Principal | Codes and Standards
> Office: 530.757.5261 | Mobile: 530.400.6825
>
>
>
>
> _____
> PG&E is committed to protecting our customers' privacy.
> To learn more, please visit http://www.pge.com/about/company/privacy/customer/
> _____
> _____
> This email originated outside of Sempra Energy. Be cautious of attachments, web links, or requests for information.
> <Furnace LCC Considerations.pptx>

Exhibit 03 - ORA-A1701013-SCG004
<031215_A>

Gallarzo, Wednesday R

From: Neil Leslie <Neil.Leslie@GASTECHNOLOGY.ORG>
Sent: Thursday, March 12, 2015 9:05 AM
To: Kristjansson, Sue
Subject: RE: CA Fuel Switching Information

How about 11 AM PDT? I am on a 189.1 call right now.

Neil Leslie
R&D Director, Building Energy Efficiency Gas Technology Institute
1700 South Mount Prospect Road
Des Plaines, IL 60018
neil.leslie@gastechnology.org
847-768-0926 (office)
847-630-0256 (mobile)
847-768-0916 (fax)

-----Original Message-----
From: Kristjansson, Sue [mailto:SKristjansson@semprautilities.com]
Sent: Thursday, March 12, 2015 10:32 AM
To: Neil Leslie
Subject: Re: CA Fuel Switching Information

Hey Neil, sorry to just be getting back to you by I've been sick with the flu the past week.

Do you have time to chat at about 10 am PST today? If so, what number can I call?

Thanks!

Sent from my iPhone

> On Mar 10, 2015, at 1:10 PM, "Neil Leslie" <Neil.Leslie@GASTECHNOLOGY.ORG> wrote:
>
> Sue,
>
> Rather than leaving voice messages, I wanted to see when is a good time to talk with you on answers to your question. I am here today and through the rest of this week.
>
> Neil Leslie
> R&D Director, Building Energy Efficiency Gas Technology Institute
> 1700 South Mount Prospect Road
> Des Plaines, IL 60018
> neil.leslie@gastechnology.org
> 847-768-0926 (office)
> 847-630-0256 (mobile)
> 847-768-0916 (fax)
>
> -----Original Message-----
> From: Kristjansson, Sue [mailto:SKristjansson@semprautilities.com]

> Sent: Thursday, March 05, 2015 3:58 PM
> To: Neil Leslie
> Subject: RE: South Carolina
>
> K. Cool, thanks.
>
> Sue Kristjansson
> Codes and Standards and ZNE Manager
> Southern California Gas Co.
> Telephone: (213) 244-5535
> Fax: (213) 226-4317
> Cell: (424) 744-0361
>
> Follow us on Twitter Like us on Facebook
>
>
> -----Original Message-----
> From: Neil Leslie [mailto:Neil.Leslie@GASTECHNOLOGY.ORG]
> Sent: Thursday, March 05, 2015 12:42 PM
> To: Kristjansson, Sue
> Subject: RE: South Carolina
>
> We have an analyst from Laclede working on it, and he is still working his way through the software. I don't know what the outcome will be, or exactly when he will be done, but as soon as I find out, I will let you know. It is a priority, so I am hopeful we will get something by next week.
>
> Neil Leslie
> R&D Director, Building Energy Efficiency Gas Technology Institute
> 1700 South Mount Prospect Road
> Des Plaines, IL 60018
> neil.leslie@gastechnology.org
> 847-768-0926 (office)
> 847-630-0256 (mobile)
> 847-768-0916 (fax)
>
> -----Original Message-----
> From: Kristjansson, Sue [mailto:SKristjansson@semprautilities.com]
> Sent: Thursday, March 05, 2015 1:21 PM
> To: Neil Leslie
> Subject: RE: South Carolina
>
> Hello my friend.
>
> Any news on this?
>
> Thanks!
>
> Sue Kristjansson
> Codes and Standards and ZNE Manager
> Southern California Gas Co.
> Telephone: (213) 244-5535
> Fax: (213) 226-4317

> Cell: (424) 744-0361
>
> Follow us on Twitter Like us on Facebook
>
>
> -----Original Message-----
> From: Neil Leslie [mailto:Neil.Leslie@GASTECHNOLOGY.ORG]
> Sent: Monday, March 02, 2015 5:49 AM
> To: Kristjansson, Sue
> Subject: RE: South Carolina
>
> I enjoyed our visit as well. I have asked our analysts to get this information if it can be pulled from the model. I will let you know what is available today or tomorrow.
>
> Neil Leslie
> R&D Director, Building Energy Efficiency Gas Technology Institute
> 1700 South Mount Prospect Road
> Des Plaines, IL 60018
> neil.leslie@gastechnology.org
> 847-768-0926 (office)
> 847-630-0256 (mobile)
> 847-768-0916 (fax)
>
> -----Original Message-----
> From: Kristjansson, Sue [mailto:SKristjansson@semprautilities.com]
> Sent: Sunday, March 01, 2015 8:11 PM
> To: Neil Leslie
> Subject: South Carolina
>
> Hey Neil,
>
> It was great seeing you in SC!
>
> As a follow-up....do you happen to have any deeper dive data regarding the potential for fuel-switching in California? Of course I would love it if you had information as granular as to our service territory or even to Southern California but will take what you've got.
>
> I've convened an internal group to assess the furnace NOPR over the next couple of weeks to determine whether this is good, bad or indifferent to our customers and I sure don't want to make that determination/recommendation without all of the info.
>
> I know you're in high demand on this issue right now so let me know what kind of timing we're looking at for some SoCal specific data.
>
> Thanks!
>
> Sent from my iPad
>
> _____
>
> This communication is for the use of the intended recipient only. It may contain information that is privileged and confidential. If you are not the intended recipient of this communication, the disclosure, copying, distribution or use

hereof is prohibited. If you have received this communication in error, please advise me by return e-mail or by telephone and then delete it immediately.
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> This email originated outside of Sempra Energy. Be cautious of attachments, web links, or requests for information.

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This email originated outside of Sempra Energy. Be cautious of attachments, web links, or requests for information.

Exhibit 04 - ORA-A1701013-SCG004
<032715_A>

Gallarzo, Wednesday R

From: Mackay, Sean C
Sent: Friday, March 27, 2015 11:49 AM
To: Kristjansson, Sue
Subject: RE: Closing Comments?

I don't think it's that big of deal if you've gotta go. You never know how long it is going to take to get to Dulles at rush hour.

If we want to ask for an extension for comments, we should ask for it in writing and put it in the docket. Also should ask AGA to make the request too.

-----Original Message-----
From: Kristjansson, Sue
Sent: Friday, March 27, 2015 2:26 PM
To: Mackay, Sean C
Subject: Closing Comments?

I'm leaving at about 3:30 so I will absolutely miss the closing statements. Here is what I would say if I was here - if you want to comment go for it, if not, no big deal.

Closing comments if you feel like it:

-First want to say that SoCalGas has and will continue to not only support but actively pursue higher efficiency levels in natural gas appliances and equipment. We have contributed significantly to the efficiency advancements in California through our rebate and incentive programs and are always looking for new and innovative ways to move the needle even more.
-We have not yet made a determination of the pending rule and are currently conducting a detailed assessment/analysis of the DOE LCC analysis and all other information and data surrounding this rule.
-Having said all of that, our first priority is to assess the impact to our customer and proceed accordingly and we will do that responsibly in such a way that we have comprehensive and validated data to make that call.
-The one thing that seems abundantly clear today, evidenced first by the significant participation of interested stakeholders but even more so by the number of uncertainties and questions raised today. Our conclusion at this point is simply that there should be some sort of delay or extension provided for providing comments. It would be irresponsible for SoCalGas to attempt to make a determination with all of these questions pending and we respectfully assert that more time for deeper evaluation would be prudent.
Sent from my iPad

Exhibit 05 - ORA-A1701013-SCG004
<072815_A>

Manke, Adam P

From: Kristjansson, Sue
Sent: Tuesday, July 28, 2015 10:47 AM
To: Rendler, Daniel
Subject: FW: AGA Executive Committee Meeting Briefing Memo & Materials
Attachments: DOE Furnace NOPR Cover Letter.pdf; DOE Furnace NOPR Comments.pdf; GTI Analysis.pdf; Negawatt Analysis.pdf

How's this?

Jan,

A little background on our SW team conversations on the DOE furnace rule. This furnace rule was discussed first at the planning session held in February in San Francisco. The SW team discussed the upcoming rulemaking and the managers agreed that this may be an occasion in which the utilities may not necessarily be on the same page. At that time Sue let the group know that SoCalGas would be doing an independent assessment of the planned rule to determine the impact on our customer. In mid-June at the C&S quarterly meeting Sue notified the C&S team that our preliminary analysis was reflecting a negative situation for our customers and that we would likely be opposing the rulemaking. We first received notification of PG&E's intent to file support documents on Tuesday, July 7th – just prior to the filing deadline of July 10th. We were actually unaware that PG&E was conducting an independent analysis until that point.

SoCalGas became engaged in the DOE proposed rulemaking earlier this year. We did some research into the background behind this rule and found that it has a long history including successful litigation filed by APGA in 2011, that validated the fact that the DOE's issuance of a direct final rule (DFR) was inappropriate and outside their scope of authority. By the time we took up the issue, the AGA had already been working with GTI for several years on assessing the DOE's analysis to determine if this was of true benefit to natural gas consumers across the country. SoCalGas decided not to rely solely on the GTI analysis so we commissioned an independent analysis using the DOE's own inputs as our basis first and then corrected with SoCalGas specific data. The outcome of our independent analysis was similar to the GTI analysis in that moving to a 92% AFUE furnace in Southern California is not cost effective for any of our customers with either the DOE's own data or the data we found to be true in our service territory. I've attached the letter and report we submitted to the DOE for your reference.

The AGA is opposed to this rulemaking and has been trying to introduce legislation that would suspend the rulemaking and instruct the DOE to form an exploratory committee to do a much deeper dive on the topic.

SoCalGas is opposing this rulemaking on behalf of our customers for a number of reasons – all of which are included in our report.

From: Kristjansson, Sue
Sent: Monday, July 27, 2015 3:13 PM
To: Rendler, Daniel
Subject: RE: AGA Executive Committee Meeting Briefing Memo & Materials

Here is a proposed response to Jan:

Jan,

SoCalGas became engaged in the DOE proposed rulemaking earlier this year. We did some research into the background behind this rule and found that it has a long history including successful litigation filed by APGA in 2011, that validated the fact that the DOE's issuance of a direct final rule (DFR) was inappropriate and outside their scope of authority. By the time we took up the issue, the AGA had already been working with GTI for several years on assessing the DOE's analysis to determine if this was of true benefit to natural gas consumers across the country. SoCalGas decided not to rely solely on the GTI analysis so we commissioned an independent analysis using the DOE's own inputs as our basis first and then corrected with SoCalGas specific data. The outcome of our independent analysis was similar to the GTI analysis in that moving to a 92% AFUE furnace in Southern California is not cost effective for any of our customers with either the DOE's own data or the data we found to be true in our service territory. I've attached the letter and report we submitted to the DOE for your reference.

The AGA is opposed to this rulemaking and has been trying to introduce legislation that would suspend the rulemaking and instruct the DOE to form an exploratory committee to do a much deeper dive on the topic.

SoCalGas opposes this rulemaking on behalf of our customers for a number of reasons – all of which are included in our report.

I hope this helps – let me know if you have any additional questions.

Sue Kristjansson
Codes and Standards and ZNE Manager
Southern California Gas Co.
Telephone: (213) 244-5535
Fax: (213) 226-4317
Cell: (424) 744-0361

Follow us on Twitter Like us on Facebook

From: Rendler, Daniel
Sent: Monday, July 27, 2015 1:31 PM
To: Kristjansson, Sue
Subject: FW: AGA Executive Committee Meeting Briefing Memo & Materials

Your suggested response (which I presume will include the letter Rodger sent?
Dan

Daniel J. Rendler
Director, Customer Programs & Assistance
Southern California Gas Company
Tel: (213) 244-3480
Cell (951) 830-6360
E-mail: drendler@semprautilities.com

From: Berman, Janice S [mailto:JSBa@pge.com]
Sent: Monday, July 27, 2015 1:01 PM
To: Rendler, Daniel
Subject: FW: AGA Executive Committee Meeting Briefing Memo & Materials

Dan,
My Gas VP has asked for a briefing on this issue, as PG&E is a bit of an outlier relative to other AGA Utilities. Where is SoCal on this?
--Jan

From: Eilert, Patrick L
Sent: Monday, July 27, 2015 11:34 AM
To: Johnson, Aaron; Berman, Janice S; Hunt, Marshall; Zelmar, Karen; Davis, Vincent
Cc: Alegre, Roenna B.; Washington, Dana; Hunt, Marshall
Subject: RE: AGA Executive Committee Meeting Briefing Memo & Materials

All:
The DOE furnace letter is attached. As you will see, the letter is based on substantial research and analysis.
Pat

Exhibit 06 - ORA-A1701013-SCG006
<ORA-A1701013-SCG006>

SOUTHERN CALIFORNIA GAS COMPANY

ADOPTION OF ITS ENERGY EFFICIENCY ROLLING PORTFOLIO BUSINESS PLAN AND RELATED RELIEF

(A.17-01-016)

(DATA REQUEST ORA-A1701013-SCG006)
Date Received: 8/9/2017
Date Submitted: 8/23/2017

CEC Tub Spout Diverter Rulemakings (Q.1-Q.4)

QUESTION 1:

Provide all documents (draft and final) and all emails relating to the CEC docket 17-AAER-09 and related dockets on tub spout diverter efficiency standards since January 1, 2016.

RESPONSE 1:

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:

Please see attached documents and emails in reference to CEC docket 17-AAER-09 provided in response 1.zip.

SOUTHERN CALIFORNIA GAS COMPANY

ADOPTION OF ITS ENERGY EFFICIENCY ROLLING PORTFOLIO BUSINESS PLAN AND RELATED RELIEF

(A.17-01-016)

(DATA REQUEST ORA-A1701013-SCG006)
Date Received: 8/9/2017
Date Submitted: 8/23/2017

QUESTION 2:

Provide any analysis completed in response to this rulemaking.

RESPONSE 2:

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

SoCalGas' analysis in response to this rulemaking is currently on-going and not currently available. SoCalGas expects to complete its analysis prior to the September 18th Phase 2 Appliance Efficiency Regulations and Roadmaps request for proposals submission due date.

SOUTHERN CALIFORNIA GAS COMPANY

ADOPTION OF ITS ENERGY EFFICIENCY ROLLING PORTFOLIO BUSINESS PLAN AND RELATED RELIEF

(A.17-01-016)

(DATA REQUEST ORA-A1701013-SCG006)
Date Received: 8/9/2017
Date Submitted: 8/23/2017

QUESTION 3:

Provide any analysis planned in response to this rulemaking and all documents (draft and final) showing planned analysis.

RESPONSE 3:

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

Project and test plans for analysis are in development. The project plan and test plan are "living documents" that are subject to change during the duration of the project. Current versions of the project plan and test plan have been provided in this response as Tub Spout Diverters High Level Project Plan 20170627a.docx and Tub Spout Diverter Draft Test Plan 20170809.docx, respectively.

Drafts of these documents can be found as part of the documents provided in Response 1.zip.

SOUTHERN CALIFORNIA GAS COMPANY

ADOPTION OF ITS ENERGY EFFICIENCY ROLLING PORTFOLIO BUSINESS PLAN AND RELATED RELIEF

(A.17-01-016)

(DATA REQUEST ORA-A1701013-SCG006)
Date Received: 8/9/2017
Date Submitted: 8/23/2017

QUESTION 4:

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

RESPONSE 4:

SoCalGas has not docketed any comment letters in regards to CEC docket 17-AAER-09.

SOUTHERN CALIFORNIA GAS COMPANY

ADOPTION OF ITS ENERGY EFFICIENCY ROLLING PORTFOLIO BUSINESS PLAN AND RELATED RELIEF

(A.17-01-016)

(DATA REQUEST ORA-A1701013-SCG006)
Date Received: 8/9/2017
Date Submitted: 8/23/2017

CEC Rulemaking Non-Response or Non-Support (Q.5-Q.6)

QUESTION 5:

Provide a list of all CEC Title 20 pre-rulemakings or rulemakings since 2014 where you either did not comment on the proposed efficiency level or did not support CEC proposed efficiency level.

RESPONSE 5:

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:

SoCalGas provides the following list of CEC Title 20 pre-rulemakings or rulemakings since 2014 where SoCalGas did not comment or support CEC proposed efficiency level:

- Tub Spout Diverters docket 17-AAER-09

SOUTHERN CALIFORNIA GAS COMPANY

ADOPTION OF ITS ENERGY EFFICIENCY ROLLING PORTFOLIO BUSINESS PLAN AND RELATED RELIEF

(A.17-01-016)

(DATA REQUEST ORA-A1701013-SCG006)
Date Received: 8/9/2017
Date Submitted: 8/23/2017

QUESTION 6:

Describe your rationale for not commenting on or for not supporting CEC's proposed efficiency level for all pre-rulemakings or rulemakings responsive to Question 6.

RESPONSE 6:

At the time of the Invitation to Participate (ITP), the first open comment period in CEC docket 17-AAER-09, research, testing and analysis had not taken place. Although SoCalGas is supportive of exploring Tub Spout Diverters for inclusion in future code, without any specific validation for the measure it seemed prudent to gather scientific data that would allow for future support that would be considered informed and indisputable. SoCalGas agreed that conducting research and considering tighter standards was sensible due to savings potential, but the CEC had already made that case very well. As a result, SoCalGas decided to not comment at that time. It is important to note that this was shared on a Statewide call with the CEC on June 22nd (Please see email in response 1.zip; 062217_S.pdf) and no objection was voiced.

Exhibit 07 - ORA-A1701013-SCG006
<041217_A>

Garcia, Daniela

From: Anderson, Mary <M3AK@pge.com>
Sent: Wednesday, April 12, 2017 3:41 PM
To: Garcia, Daniela
Subject: [EXTERNAL] RE: Title 20 Prioritities and funding dicussion Notes

I apologize for the delay. Energy Solutions has completed/begun the following items:

- Began talks with EPA Energy Star to understand their methodology, data gaps and manufacturer support
- Analyzed products in the CEC data base
- Created a draft research plan

Let me know if you have any questions.

From: Garcia, Daniela [mailto:DGarcia3@semprautilities.com]
Sent: Monday, April 10, 2017 8:10 AM
To: Anderson, Mary
Subject: FW: Title 20 Prioritities and funding dicussion Notes

This is an EXTERNAL EMAIL. Stop and think before clicking links or opening attachments.
****

Good Morning Mary,

I wanted to follow up in regards to the tub spout diverters work that has been completed to date. We are interested in taking the measure on but I will seek approval once I can use the work that's been completed to explain the measure to our internal team.

Thank You,

Daniela Garcia
SoCalGas Customer Programs
Project Manager – Building Codes and Appliance Standards
555 W. 5th Street, Los Angeles, CA 90013 | ML: GT19A6
Office: 213-244-4361 | Mobile: 951-847-1022
DGarcia3@semprautilities.com

From: Anderson, Mary [mailto:M3AK@pge.com]
Sent: Thursday, March 30, 2017 9:06 AM
To: Barbour, John L <JBarbour@semprautilities.com>; Reefe, Jeremy <JMReefe@semprautilities.com>; Garcia, Daniela <DGarcia3@semprautilities.com>; Sim, Michelle M <MSim@semprautilities.com>; Charles Kim <Charles.Kim@sce.com>; 'randall Higa' <randall.higa@sce.com>; Elliott, Ed <ESE1@pge.com>
Cc: Michelle Thomas (Michelle.Thomas@sce.com) <Michelle.Thomas@sce.com>; Eilert, Patrick <PLE2@pge.com>; Kristjansson, Sue <SKristjansson@semprautilities.com>
Subject: [EXTERNAL] RE: Title 20 Prioritities and funding dicussion Notes

Attendees
SDG&E – John,
SCG - Michelle

SCE – Charles, Randall
PG&E – Mary

- Phase 1 Topics – Current Leads and funding continue
- C&I Fans – SCE fans with co-funding, SDG&E is also interested in supporting – SCE funds 2017
- GSL – CEC will get back to the IOUs, waiting and seeing.
- Sprinkler Spray bodies – PG&E leads and funds
- Tub Spout Diverters – PG&E has worked with NRDC will work with NRDC, SCG is a tentative lead, PG&E will get a ballpark estimate, Ballpark estimate $150k-$200k, SCG leads tentative
- Irrigation Controllers – PG&E leads and funds, SDG&E can support
- Set top boxes roadmap – SCE may lead, co-funding might be helpful, PG&E has close relationships with CTA through RPP that might be able to support our effort, SCE will lead in 2017,
- Standby Power – PG&E lead and fund, SCE may collaborate on the Imaging equipment
- Solar Inverters – Co-funding, SCE as SME, SDG&E can strongly support where possible, need further clarification on definitions
- PG&E needs to know in the next 2-3 weeks if other IOUs need funds for upcoming CASE study.
- SCE would like to ask the CEC to include the IOUs in the planning process.
-

Appliance	Approach	Track	CEC Staff	Current Lead	F
Pool Pump Motors	Efficiency standards	Phase 1	?	SCE	S
Portable Spas	Efficiency standards	Phase 1	?	SCE	S
Com. Clothes Dryers	Test Procedure	Phase 1	Sean Steffensen	PG&E	S PG
Fans & blowers	Efficiency standards	Extended	Alex Galdamez & Ryan Nelson		
General service lamps	Efficiency standards	Regular	Pat Saxton	PG&E	F
Sprinkler spray bodies	Efficiency standards	Regular	Sean Steffensen	PG&E	F
Tub-spout diverters	Efficiency standards	Regular	Jessica Lopez		

Irrigation controllers	Energy efficiency standards; water efficiency test and list	Regular	Ryan Nelson	PG&E	F
Set-top boxes	Roadmap to replace Vol. Agmt.	Roadmap	Pat Saxton & Soheila Pasha	SCE	S
Standby mode	Data gathering to identify 10 products	Roadmap	Soheila Pasha	PG&E	F
Solar inverters	Data gathering	Roadmap	Pat Saxton		

Agenda

- Review of Last week's conversation
- Lead discussion/decision making
- Next Steps

-- Do not delete or change any of the following text. --

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Exhibit 08 - ORA-A1701013-SCG006
<042417_A>

Garcia, Daniela

From: Marc Esser <marc@negawattconsult.com>
Sent: Monday, April 24, 2017 11:58 AM
To: Garcia, Daniela
Cc: Bo White
Subject: [EXTERNAL] Re: Title 20 Tub Spout Diverters

Thank you Daniela,

Always happy to take on new work, this is much appreciated.

We'll review shortly and will get back to you with questions and comments. Please keep us posted with any relevant meetings or materials that you know of.

Marc

--
Marc Esser
NegaWatt Consulting, Inc.
(619) 309-4191
www.negawattconsult.com

On Apr 24, 2017 11:34 AM, "Garcia, Daniela" <DGarcia3@semprautilities.com> wrote:

> Marc,
>
> As you know we have been looking to take on another measure, this time for T20. Below please find the T20 priorities from the CEC (also attached memo with further details on "Track definitions"). SoCalGas has committed to leading the Tub- Spout Diverters. Our CEC contact will be Jessica Lopez, I have not met her and she may be new to the CEC Appliance team as they have a few new members.

Appliance	Approach	Track	CEC Staff	Current Lead
Pool Pump Motors	Efficiency standards	Phase 1	?	SCE
Portable Spas	Efficiency standards	Phase 1	?	SCE
Com. Clothes Dryers	Test Procedure	Phase 1	Sean Steffensen	PG&E

Fans & blowers	Efficiency standards	Extended	Alex Galdamez & Ryan Nelson	
General service lamps	Efficiency standards	Regular	Pat Saxton	PG&E
Sprinkler spray bodies	Efficiency standards	Regular	Sean Steffensen	PG&E
Tub-spout diverters	Efficiency standards	Regular	Jessica Lopez	
Irrigation controllers	Energy efficiency standards; water efficiency test and list	Regular	Ryan Nelson	PG&E
Set-top boxes	Roadmap to replace Vol. Agmt.	Roadmap	Pat Saxton & Soheila Pasha	SCE
Standby mode	Data gathering to identify 10 products	Roadmap	Soheila Pasha	PG&E
Solar inverters	Data gathering	Roadmap	Pat Saxton	

PGE has begun some work on this measure so Mary provided some bullets as to what Energy Solutions has worked on. I am working on getting write ups for these items listed below: (will forward as soon as I receive)

- Began talks with EPA Energy Star to understand their methodology, data gaps and manufacturer support
- Analyzed products in the CEC data base
- Created a draft research plan

Attached please find SoCalGas' work paper for your references and review as well.

At this time we don't have any deliverables, rather just review of the measure and if we can begin to put together a budget and timeline similar to DWHR.

Please let me know should you have any questions and are up for another CASE Report!

Thank You,

Daniela Garcia

SoCalGas Customer Programs

Project Manager – Building Codes and Appliance Standards

555 W. 5th Street, Los Angeles, CA 90013 | ML: GT19A6

Office: 213-244-4361 | Mobile: 951-847-1022

DGarcia3@semprautilities.com

Exhibit 09 - ORA-A1701013-SCG006
<050417_A>

Garcia, Daniela

From: Marc Esser <marc@negawattconsult.com>
Sent: Thursday, May 4, 2017 5:58 PM
To: Garcia, Daniela
Cc: Bo White
Subject: [EXTERNAL] Re: Title 20 Tub Spout Diverters

Hi Daniela,

I haven't had a chance to look at this yet, but will shortly. Did you receive any other materials from PG&E? You said in your original email that you were hoping to get write-ups on the following

- Began talks with EPA Energy Star to understand their methodology, data gaps and manufacturer support
- Analyzed products in the CEC data base
- Created a draft research plan

Thank you

On Mon, Apr 24, 2017 at 11:57 AM, Marc Esser <marc@negawattconsult.com> wrote:

> Thank you Daniela,
>
> Always happy to take on new work, this is much appreciated.
>
> We'll review shortly and will get back to you with questions and comments. Please keep us posted with any relevant meetings or materials that you know of.
>
> Marc
>
> --
> Marc Esser
> NegaWatt Consulting, Inc.
> (619) 309-4191
> www.negawattconsult.com
>
> CONFIDENTIALITY NOTICE: This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message.
>
> On Apr 24, 2017 11:34 AM, "Garcia, Daniela" <DGarcia3@semprautilities.com> wrote:
>
> > Marc,

As you know we have been looking to take on another measure, this time for T20. Below please find the T20 priorities from the CEC (also attached memo with further details on "Track definitions"). SoCalGas has committed to leading the Tub- Spout Diverters. Our CEC contact will be Jessica Lopez, I have not met her and she may be new to the CEC Appliance team as they have a few new members.

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Portable Spas	Efficiency standards	Phase 1	?	SCE
Com. Clothes Dryers	Test Procedure	Phase 1	Sean Steffensen	PG&E
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Attached please find SoCalGas' work paper for your references and review as well.

At this time we don't have any deliverables, rather just review of the measure and if we can begin to put together a budget and timeline similar to DWHR.

Please let me know should you have any questions and are up for another CASE Report!

Thank You,

Daniela Garcia

SoCalGas Customer Programs

Project Manager – Building Codes and Appliance Standards

555 W. 5th Street, Los Angeles, CA 90013 | ML: GT19A6

Office: 213-244-4361 | Mobile: 951-847-1022

DGarcia3@semprautilities.com

--
Marc Esser
NegaWatt Consulting, Inc.
(619) 309-4191
www.negawattconsult.com

Exhibit 10 - ORA-A1701013-SCG006
<051517_17>

Garcia, Daniela

From: Garcia, Daniela
Sent: Monday, May 15, 2017 7:58 AM
To: 'Anderson, Mary'
Subject: RE: Title 20 Prioritities and funding dicussion Notes

Mary,

Did you have an update on the status of sharing the documents or information regarding the tub spout diverters?

Daniela Garcia
SoCalGas Customer Programs
Project Manager – Building Codes and Appliance Standards
555 W. 5th Street, Los Angeles, CA 90013 | ML: GT19A6
Office: 213-244-4361 | Mobile: 951-847-1022
DGarcia3@semprautilities.com

From: Anderson, Mary [mailto:M3AK@pge.com]
Sent: Wednesday, April 12, 2017 3:41 PM
To: Garcia, Daniela <DGarcia3@semprautilities.com>
Subject: [EXTERNAL] RE: Title 20 Prioritities and funding dicussion Notes

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Let me know if you have any questions.

From: Garcia, Daniela [mailto:DGarcia3@semprautilities.com]
Sent: Monday, April 10, 2017 8:10 AM
To: Anderson, Mary
Subject: FW: Title 20 Prioritities and funding dicussion Notes

Good Morning Mary,

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Thank You,

Daniela Garcia
SoCalGas Customer Programs

Project Manager – Building Codes and Appliance Standards
555 W. 5th Street, Los Angeles, CA 90013 | ML: GT19A6
Office: 213-244-4361 | Mobile: 951-847-1022
DGarcia3@semprautilities.com

From: Anderson, Mary [mailto:M3AK@pge.com]
Sent: Thursday, March 30, 2017 9:06 AM
To: Barbour, John L <JBarbour@semprautilities.com>; Reefe, Jeremy <JMReefe@semprautilities.com>; Garcia, Daniela <DGarcia3@semprautilities.com>; Sim, Michelle M <MSim@semprautilities.com>; Charles Kim <Charles.Kim@sce.com>; 'randall Higa' <randall.higa@sce.com>; Elliott, Ed <ESE1@pge.com>
Cc: Michelle Thomas (Michelle.Thomas@sce.com) <Michelle.Thomas@sce.com>; Eilert, Patrick <PLE2@pge.com>; Kristjansson, Sue <SKristjansson@semprautilities.com>
Subject: [EXTERNAL] RE: Title 20 Prioritities and funding dicussion Notes

Attendees
SDG&E – John,
SCG - Michelle
SCE – Charles, Randall
PG&E – Mary

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- Irrigation Controllers – PG&E leads and funds, SDG&E can support
- Set top boxes roadmap – SCE may lead, co-funding might be helpful, PG&E has close relationships with CTA through RPP that might be able to support our effort, SCE will lead in 2017,
- Standby Power – PG&E lead and fund, SCE may collaborate on the Imaging equipment
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- SCE would like to ask the CEC to include the IOUs in the planning process.
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Appliance	Approach	Track	CEC Staff	Current Lead	F
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Com. Clothes Dryers	Test Procedure	Phase 1	Sean Steffensen	PG&E	S PG
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Set-top boxes	Roadmap to replace Vol. Agmt.	Roadmap	Pat Saxton & Soheila Pasha	SCE	S
Standby mode	Data gathering to identify 10 products	Roadmap	Soheila Pasha	PG&E	F
Solar inverters	Data gathering	Roadmap	Pat Saxton		

Agenda

- Review of Last week's conversation
- Lead discussion/decision making
- Next Steps

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Exhibit 11 - ORA-A1701013-SCG006
<051617_A>

Garcia, Daniela

From: Marc Esser <marc@negawattconsult.com>
Sent: Tuesday, May 16, 2017 2:35 PM
To: Garcia, Daniela
Subject: [EXTERNAL] Re: Re: Re: CALIFORNIA ENERGY COMMISSION - Notice of Invitation to Participate and Staff Webinar

Hi Daniela,

I gave this presentation another good look. The CEC is basically asking a number of research questions that could and should be answered as part of the study, and that's all well done.
The only things that come to my mind are
1) they don't justify the merit of the project with a water & therm savings (gu)estimate, and
2) there is no rudimentary assessment of technical feasibility. It may be prohibitively hard or expensive to go from the present 0.01/0.05gpm to something better.
The study would of course answer both questions. It's just that if the answers were somewhat "negative" or unimpressive, going through with the full study regardless could be construed as somewhat of a waste of ratepayer money. Let me know if you feel this is a concern that we should comment on; I am thinking probably not.

Oh also, do you mind if I buy a copy of the testing standard for these? I'll look on the internet as well, but I doubt I'll find it for free. It's a CSA standard again, like for DWHR. it's $138.

Thanks
Marc

On Mon, May 15, 2017 at 8:12 AM, Garcia, Daniela <DGarcia3@semprautilities.com> wrote:

> Thanks Marc, I went ahead and forwarded to engineering and the authors of the work paper internally for their review. I am still pending the documents form Mary but followed up with her this morning.
>
> Please let me know if we need to set up any time to discuss next steps or if comments will be necessary by June 16th.
>
> Thank You,
>
> *Daniela Garcia*
>
> SoCalGas Customer Programs
>
> Project Manager – Building Codes and Appliance Standards

555 W. 5th Street, Los Angeles, CA 90013 | ML: GT19A6

Office: 213-244-4361 | Mobile: 951-847-1022

DGarcia3@semprautilities.com

From: Marc Esser [mailto:marc@negawattconsult.com]
Sent: Thursday, May 11, 2017 11:24 AM
To: Garcia, Daniela <DGarcia3@semprautilities.com>
Subject: [EXTERNAL] Re: Re: CALIFORNIA ENERGY COMMISSION - Notice of Invitation to Participate and Staff Webinar

here they are, in case you need them. I deleted the rest of the presentation

On Thu, May 11, 2017 at 11:13 AM, Garcia, Daniela <DGarcia3@semprautilities.com> wrote:

> I was just sending you a note, I think they are way ahead of schedule. Sounds good, thanks!
>
> **From:** Marc Esser [mailto:marc@negawattconsult.com]
> **Sent:** Thursday, May 11, 2017 11:12 AM
> **To:** Garcia, Daniela <DGarcia3@semprautilities.com>
> **Subject:** [EXTERNAL] Re: CALIFORNIA ENERGY COMMISSION - Notice of Invitation to Participate and Staff Webinar
>
> I joined around 11:08 but never saw them pull up any Tub spout slides; heard them ask for related questions, and then move on to afternoon topics. I'll get off the call and will download the slides for future reference
>
> On Thu, May 11, 2017 at 8:34 AM, Garcia, Daniela <DGarcia3@semprautilities.com> wrote:
>
> > Marc,
> >
> > I planned to call in but just in case you are free from 11:15-11:30 Tub Spout sis on the agenda.
> >
> > *Daniela García*

SoCalGas Customer Programs

Project Manager – Building Codes and Appliance Standards

555 W. 5th Street, Los Angeles, CA 90013 | ML: GT19A6

Office: 213-244-4361 | Mobile: 951-847-1022

DGarcia3@semprautilities.com

Thursday, May 11, 2017 10 a.m. CALIFORNIA ENERGY COMMISSION Remote Access Available by Computer or Phone via WebEx™ (Instructions below)

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https://efiling.energy.ca.gov/getdocument.aspx?tn=217220

10:00 AM	to	10:45 AM	PDT	Introduction
11:00 AM	to	11:15 AM	PDT	Commercial and Industrial Fans and Blowers
11:15 AM	to	11:30 AM	PDT	Tub Spout Diverters
11:30 AM	to	11:45 AM	PDT	Sprinkler Spray Bodies
11:45 AM	to	12:45 PM	PDT	Lunch
12:45 PM	to	1:00 PM	PDT	Afternoon Introduction
1:00 PM	to	1:15 PM	PDT	Irrigation Controllers
1:15 PM	to	1:30 PM	PDT	Low-Power Modes (Roadmap)
1:30 PM	to	1:45 PM	PDT	Power Factor (Roadmap)
1:45 PM	to	2:00 PM	PDT	Set-Top Boxes(Roadmap)
2:00 PM	to	2:15 PM	PDT	Solar Inverters(Roadmap)
2:15 PM	to	2:30 PM	PDT	General Service Lamps (Expanded Scope)
2:30 PM	to	3:30 PM	PDT	Questions & Conclusion

--

Marc Esser
NegaWatt Consulting, Inc.
(619) 309-4191
www.negawattconsult.com

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--

Marc Esser
NegaWatt Consulting, Inc.
(619) 309-4191
www.negawattconsult.com

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--
Marc Esser
NegaWatt Consulting, Inc.
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Exhibit 12 - ORA-A1701013-SCG006
<051817_A>

Garcia, Daniela

From: Anderson, Mary <M3AK@pge.com>
Sent: Thursday, May 18, 2017 11:23 PM
To: Garcia, Daniela
Subject: [EXTERNAL] FW: WS Bath & Shower Diverter Next Steps
Attachments: WS Tub Spout Diverters - NOI Summary.docx

Daniela,
I just debriefed with ES. They haven't completed the analysis on the tub spout diverters. Water Sense has issued a Notice of Intent (attached) and we need to respond to the questions outlined in the NOI. Here are the ideas on how to respond to the NOI. We can have Negawatt respond or I can have Energy Solutions respond. It is up to you. Let me know if you have questions. Thanks!

Mary

Next Steps

- We will conduct more research to answer EPA's questions they outlined in the NOI, including outreach to industry experts (e.g., test labs, NRDC, manufacturers, water utilities) who may provide input on scope, testing, labeling, marketing etc.

- We will reach out to test labs (see below table) to inquire about conducting a series of tests to determine:
    1. the appropriate savings factor(s) across a range of real-world scenarios, as requested by EPA,
    2. if the life-cycle test should be increased from 15,000 cycles to perhaps 20,000 or 25,000 cycles to better reflect product durability and lifetime, and
    3. how various factors (e.g., water hardness, water pH) could potentially cause a bath and shower diverter to leak in real-world applications, as requested by EPA.

  The amount of time and cost it will take to conduct testing may pose a challenge in submitting data to EPA in a timely manner. As such, we will try to obtain information on test time and cost from the test labs as soon as possible.

- We will work in collaboration with NRDC, as they have been involved in the WaterSense diveter process and they are well-connected in the industry. We have already been in preliminary discussions with Ed Osann of NRDC with respect to the potential Title 20 update for tub spout diverters. Also, Mr. Osann previously spoke with Gauley Associates to conduct life-cycle testing of diverters, and so we plan on contacting them about potential testing.

Plumbing Fittings Test Labs

Company	Location	Notes
Gauley Associates	Canada	Recommended by NRDC. Works closely with John Koeller of MaP Testing
BR Laboratories, Inc.	Huntington Beach, CA	CEC-Approved Test Lab
IAPMO R&T Laboratory	Ontario, California	CEC-Approved Test Lab
Pfister - Spectrum Brands Hardware and Home Improvement	Lake Forest, CA	CEC-Approved Test Lab
U.S. Analytical Laboratories	Fullerton, CA	CEC-Approved Test Lab

Thank you,

Sarah

Sarah Yuko Schneider | Project Manager II | sschneider@energy-solution.com | (510) 482-4420 x202 | 449 15th Street, Oakland CA 94612

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Exhibit 13 - ORA-A1701013-SCG006
<052217_C>

Garcia, Daniela

From: Marc Esser <marc@negawattconsult.com>
Sent: Monday, May 22, 2017 12:55 PM
To: Garcia, Daniela
Cc: Bo White
Subject: [EXTERNAL] Re: Re: FW: WS Bath & Shower Diverter Next Steps

Thanks Daniela, that all sounds good.

Let me get organized a bit, and when Bo is back next week we'll work on a plan of action for both the NOI and the T20 project. Does it make sense to try and be semi-ready with that by 6/1 in case any side conversations with the CEC develop? Or is that a different group at the CEC altogether? The analyst in charge per the slides was Jessica Lopez; I don't know her, do you?

Re budget & tracking, does it make sense to keep the NOI / Watersense under Advocacy, or do you feel it's so closely related to T20 that we should bundle it? Bundling is easier to track for us, but that doesn't have to be the determining factor.

Marc

On Mon, May 22, 2017 at 12:23 PM, Garcia, Daniela <DGarcia3@semprautilities.com> wrote:

> Hi Marc,
>
> Thank you for your quick reply! I agree, I think taking this on now will be very beneficial to our work for the CASE Report. As far as the timeframe I think we can work with Stephanie Tanner at Water Sense. Mary stated she is the contact and if we are friendly with our approach she is very good to work with and we can work out the details for the dates with her. The product is already in the CEC database so that may help with whether we need lab work etc.
>
> So I think it's good to say I will let Mary know Negawatt/SoCalGas will take the lead on the NOI.
>
> Please let know if you have any questions or concerns and we can check on a status update when you have made some progress. I will set a reminder to check in with you but please feel free to reach out if you need to touch base.
>
> Thank You,
>
> *Daniela Garcia*
>
> SoCalGas Customer Programs

Project Manager – Building Codes and Appliance Standards

555 W. 5th Street, Los Angeles, CA 90013 | ML: GT19A6

Office: 213-244-4361 | Mobile: 951-847-1022

DGarcia3@semprautilities.com

From: Marc Esser [mailto:marc@negawattconsult.com]
Sent: Monday, May 22, 2017 11:39 AM
To: Garcia, Daniela <DGarcia3@semprautilities.com>
Cc: Bo White <bo@negawattconsult.com>
Subject: [EXTERNAL] Re: FW: WS Bath & Shower Diverter Next Steps

Hi Daniela,

Sarah's document is good executive summary & high level action plan of the issue. The next steps proposed in Mary's email are verbatim from that document.

if you'd like for us to take over the project and the response to the NOI, I think we might as well do it now. If we let Energy Solutions respond, IMHO there will be some unnecessary overhead.

- anyone wanting to have a dialogue about the response will reach out to them first, while we'll be in charge at some point.
- we'll be in a better position to have that dialogue, if we write the response and do the research ourselves.
- we may have other/more comments than they have drafted so far.

I agree with Sarah's next steps and proposed comments at a high level; in particular, there is a critical path item of figuring out whether lab work is needed. If that's the case, there will not be enough time to produce all the answers by "June/July". We could have a research plan for those questions ready, that would align with the Title 20 work for the CEC.

Marc

On Mon, May 22, 2017 at 8:33 AM, Garcia, Daniela <DGarcia3@semprautilities.com> wrote:

Marc,

Mary passed this along regarding where Energy Solutions is at with Tub Spout Diverters. Can you please review the attachment and her email. There is NOI that was issued by Water Sense that is pending a response. The NOI is an open process so there isn't a defined comment period. See email in attachment (pg.8) from March stating they had a few months.

Based on the timing I can have Mary let Energy Solutions respond to this NOI or we can take it from here. Please let me know your thoughts at the earliest.

Daniela Garcia

SoCalGas Customer Programs

Project Manager – Building Codes and Appliance Standards

555 W. 5th Street, Los Angeles, CA 90013 | ML: GT19A6

Office: 213-244-4361 | Mobile: 951-847-1022

DGarcia3@semprautilities.com

From: Anderson, Mary [mailto:M3AK@pge.com]
Sent: Thursday, May 18, 2017 11:23 PM
To: Garcia, Daniela <DGarcia3@semprautilities.com>
Subject: [EXTERNAL] FW: WS Bath & Shower Diverter Next Steps

Daniela,

I just debriefed with ES. They haven't completed the analysis on the tub spout diverters. Water Sense has issued a Notice of Intent (attached) and we need to respond to the questions outlined in the NOI. Here are the ideas on how to respond to the NOI. We can have Negawatt respond or I can have Energy Solutions respond. It is up to you. Let me know if you have questions. Thanks!

Mary

Next Steps

- We will conduct more research to answer EPA's questions they outlined in the NOI, including outreach to industry experts (e.g., test labs, NRDC, manufacturers, water utilities) who may provide input on scope, testing, labeling, marketing etc.

- We will reach out to test labs (see below table) to inquire about conducting a series of tests to determine:

    1. the appropriate savings factor(s) across a range of real-world scenarios, as requested by EPA,

    2. if the life-cycle test should be increased from 15,000 cycles to perhaps 20,000 or 25,000 cycles to better reflect product durability and lifetime, and

    3. how various factors (e.g., water hardness, water pH) could potentially cause a bath and shower diverter to leak in real-world applications, as requested by EPA.

    The amount of time and cost it will take to conduct testing may pose a challenge in submitting data to EPA in a timely manner. As such, we will try to obtain information on test time and cost from the test labs as soon as possible.

- We will work in collaboration with NRDC, as they have been involved in the WaterSense diveter process and they are well-connected in the industry. We have already been in preliminary discussions with Ed Osann of NRDC with respect to the potential Title 20 update for tub spout diverters. Also, Mr. Osann previously spoke with Gauley Associates to conduct life-cycle testing of diverters, and so we plan on contacting them about potential testing.

Plumbing Fittings Test Labs

Company	Location	Notes
Gauley Associates	Canada	Recommended by NRDC. Works closely with John Koeller of MaP Testing
BR Laboratories, Inc.	Huntington Beach, CA	CEC-Approved Test Lab
IAPMO R&T Laboratory	Ontario, California	CEC-Approved Test Lab
Pfister - Spectrum Brands Hardware and Home Improvement	Lake Forest, CA	CEC-Approved Test Lab
U.S. Analytical Laboratories	Fullerton, CA	CEC-Approved Test Lab

Thank you,

Sarah

Sarah Yuko Schneider | Project Manager II | sschneider@energy-solution.com | (510) 482-4420 x202 | 449 15th Street, Oakland CA 94612

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Exhibit 14 - ORA-A1701013-SCG006
<052317_B>

Garcia, Daniela

From: Anderson, Mary <M3AK@pge.com>
Sent: Tuesday, May 23, 2017 1:14 PM
To: Garcia, Daniela
Subject: [EXTERNAL] RE: Appliance Standards Subprogram Swimlane Meeting Notes

I am comfortable with you reaching out to the CEC and think it is the right thing to do. According to the SW team norms we need to inform the team after having a discussion with the CEC or other decision makers.

From: Garcia, Daniela [mailto:DGarcia3@semprautilities.com]
Sent: Tuesday, May 23, 2017 1:06 PM
To: Anderson, Mary
Subject: RE: Appliance Standards Subprogram Swimlane Meeting Notes

This is an EXTERNAL EMAIL. Stop and think before clicking links or opening attachments.
****

Mary,

With our work starting on the Tub Spouts I wanted to see if there was any protocol on contacting the CEC assigned person for our measure. Jessica Lopez, I believe is our analyst. At some point in the next few weeks I was thinking of reaching out and introducing ourselves and letting her know we would be leading the measure.

Please let me know if this works or if we are waiting for any introductions or kick off meeting.

Thanks!

Daniela Garcia
SoCalGas Customer Programs
Project Manager – Building Codes and Appliance Standards
555 W. 5th Street, Los Angeles, CA 90013 | ML: GT19A6
Office: 213-244-4361 | Mobile: 951-847-1022
DGarcia3@semprautilities.com

From: Anderson, Mary [mailto:M3AK@pge.com]
Sent: Monday, May 22, 2017 2:25 PM
To: Barbour, John L <JBarbour@semprautilities.com>; Reefe, Jeremy <JMReefe@semprautilities.com>; Garcia, Daniela <DGarcia3@semprautilities.com>; Charles Kim <Charles.Kim@sce.com>
Cc: Eilert, Patrick <PLE2@pge.com>
Subject: [EXTERNAL] Appliance Standards Subprogram Swimlane Meeting Notes

Here are my notes from today. Please look and let me know if there are any edits that need to be made. Thanks!

Exhibit 15 - ORA-A1701013-SCG006
<061517_A>

Garcia, Daniela

From: Garcia, Daniela
Sent: Thursday, June 15, 2017 2:58 PM
To: Kristjansson, Sue
Subject: RE: Check In on Diverters (Title 20)/ NRDC Call

Hey Sue,

The call went well, NRDC is very interested in the Tub Spouts so they want to make sure that we work in collaboration with them as they have conducted life-cycle testing of diverters. PGE started these conversations with them prior to us taking this measure so they had discussed potential testing. So I will just work to keep them in the discussions.

Daniela Garcia
SoCalGas Customer Programs
Project Manager – Building Codes and Appliance Standards
555 W. 5th Street, Los Angeles, CA 90013 | ML: GT19A6
Office: 213-244-4361 | Mobile: 951-847-1022
DGarcia3@semprautilities.com

From: Kristjansson, Sue
Sent: Thursday, June 15, 2017 2:04 PM
To: Garcia, Daniela <DGarcia3@semprautilities.com>
Subject: Re: Check In on Diverters (Title 20)/ NRDC Call

Okay. Let me know how it goes.

Sent from my iPhone

On Jun 15, 2017, at 9:41 AM, Garcia, Daniela <DGarcia3@semprautilities.com> wrote:

> Hi Sue,
>
> I just wanted to keep you in the loop. We have taken on the Tub Spout T20 measure and NRDC has reached out asking for a meeting. I will be having a quick call with them today 2-2:15 and have included Marc and Bo.
>
> From what Mary has previously stated PGE had already been in preliminary discussions with Ed Osann, Policy Analyst, of NRDC with respect to the potential Title 20 update for tub spout diverters about potential testing.
>
> Thank You,
> *Daniela Garcia*
> SoCalGas Customer Programs
> Project Manager – Building Codes and Appliance Standards
> 555 W. 5th Street, Los Angeles, CA 90013 | ML: GT19A6
> Office: 213-244-4361 | Mobile: 951-847-1022
> DGarcia3@semprautilities.com

From: Garcia, Daniela
Sent: Thursday, June 15, 2017 8:07 AM
To: 'Lee, Susan' <slee@nrdc.org>
Subject: RE: Check In on Diverters (Title 20)

Hi Susan,

Yes, we just took the lead for that measure. With that being said we don't have anything to share yet but we can set something up if there's something you would to share. We will have a draft project plan early to mid-July so we could always set something up then as well since Ed will be back by then.

Thanks!

Daniela Garcia
SoCalGas Customer Programs
Project Manager – Building Codes and Appliance Standards
555 W. 5th Street, Los Angeles, CA 90013 | ML: GT19A6
Office: 213-244-4361 | Mobile: 951-847-1022
DGarcia3@semprautilities.com

From: Lee, Susan [mailto:slee@nrdc.org]
Sent: Thursday, June 15, 2017 7:14 AM
To: Garcia, Daniela <DGarcia3@semprautilities.com>
Subject: [EXTERNAL] RE: Check In on Diverters (Title 20)

Hi Daniela,

My name is Susan Lee and I support Ed Osann at NRDC. I am following up on the email Ed sent yesterday. Will you be available for a call today?

Thank you,

SUSAN LEE
Program Assistant- Water & Corporate Counsel

NATURAL RESOURCES
DEFENSE COUNCIL
1152 15TH STREET NW, SUITE 300
WASHINGTON, DC 20005
T 202.289.2369
SLEE@NRDC.ORG
NRDC.ORG

From: Osann, Ed
Sent: Wednesday, June 14, 2017 1:32 PM
To: DGarcia3@semprautilities.com
Cc: Lee, Susan <slee@nrdc.org>
Subject: Check In on Diverters (Title 20)

Hi Daniela –

I understand that you have the lead for the CA utilities team on CEC rulemaking for tub spout diverters. We also have an interest in supporting revised Title 20 standards for these products, as they offer a cost effective opportunity to save both energy and water. Any chance we can compare notes with you and/or your technical consultant? I'm around today and tomorrow, but after that I'll be out of the country for the rest of June.

Ed

Edward R. Osann | Senior Policy Analyst
Natural Resources Defense Council | 1152 15th Street, NW | Washington, DC 20005
Phone: (202) 289-6868 | email: EOsann@nrdc.org | www.NRDC.org

---

Exhibit 16 - ORA-A1701013-SCG006
<062317_C>

Garcia, Daniela

From: Anderson, Mary <M3AK@pge.com>
Sent: Friday, June 23, 2017 11:07 AM
To: Eilert, Patrick; Kristjansson, Sue; Thomas, Michelle; Zeng, Kate
Cc: Garcia, Daniela; Reefe, Jeremy; Kim, Charles
Subject: [EXTERNAL] RE: Tub-Spout Diverters

For background for folks who haven't been involved in this process before here are some important items to keep in mind.

- The CEC released an Invitation to Participate(ITP) and the IOUs responded to all of the measures except tub spout diverters. While it isn't required for the IOUs to participate we have historically responded to all (that I am aware of) of the opportunities with some form of a response and public support.
- On the other measures we had been in communication with the CEC regarding our responses and didn't let the CEC know that weren't responding to the ITP for tub spout diverters.
- Daniela let the team know a few days before the ITP response deadline that she didn't believe we had sufficient information to respond to the ITP. None of the other IOUs expressed concern. It appears that wasn't communicated to the CEC.
- In the last meeting with the CEC they asked the IOUs about our lack of response and if we planned on submitting a response and we stated that we were not.
- In situations where there is little to no pushback (although the vast majority of rulemakings have some pushback) it could be okay not to respond, in my opinion.
- The CEC requested a meeting with the IOUs and the CASE authors (they stated it is a high priority for them)regarding the research plan on tub spout diverters.
- The draft standards proposal for all Phase 2 topics, including tub spout diverters is due middle to end of August.

From: Eilert, Patrick
Sent: Friday, June 23, 2017 10:11 AM
To: Kristjansson, Sue; Thomas, Michelle; Zeng, Kate
Cc: Anderson, Mary; Garcia, Daniela; Reefe, Jeremy; Kim, Charles
Subject: FW: Tub-Spout Diverters

Sue/Michelle/Kate-
I have asked Mary to send an Outlook invitation to discuss.
Thank you.
Pat

From: Driskell, Kristen@Energy [mailto:Kristen.Driskell@energy.ca.gov]
Sent: Thursday, June 22, 2017 4:45 PM
To: Eilert, Patrick
Cc: Anderson, Mary
Subject: Tub-Spout Diverters

*****CAUTION**: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.*****

Hi Pat,

Hope you're doing well.

I was surprised not to receive comments from the IOUs on tub-spout diverters. We got a lot of opposition to the idea of lowering the leakage rate, and no support (EPA was neutral). It would be nice to know earlier rather than later whether IOU's will be supporting this effort or not. Let me know if you'd like to talk by phone.

Thanks,
Kristen

Kristen M. Driskell
Appliances & Outreach & Education Office
Efficiency Division
California Energy Commission
(916) 654-3957
Kristen.Driskell@energy.ca.gov

Exhibit 17 - A1701013-PGE006
<020215>
https://docs.wixstatic.com/ugd/0c9650_e2ca6ea1850145b69836cd6a700c6bfd.pdf

From:	Andrew deLaski
To:	Bijit Kundu; Bryan Boyce; Harvey Sachs; Hunt, Marshall; Jennifer Amann; Joanna Mauer; Lis, David J.; Longstreth, Ben; Louis Starr; Marianne DiMascio; Meg Waltner; Rodney Sobin; Steve Nadel; Timothy Ballo
Subject:	prep for Thurs AHRI meeting - URGENT
Date:	Monday, February 02, 2015 3:31:27 PM
Attachments:	Agenda - Negotiations ULE Products 02-05-15.docx

Hi all: As decided at the end of our Jan 8 meeting with AHRI, we are slated to meet with AHRI again this Thursday at their offices to continue our talks about roof top units.

Our group really should talk before we get together with AHRI and time is short, so please respond as soon as you get this message to the doodle poll at

http://doodle.com/b35rwtup4cdd2fyf

I'll pick a time for tomorrow or Wednesday and send out a meeting invite as soon as a critical mass has filled out the poll.

I have attached here the draft agenda for the Thursday meeting. Feedback welcome by email and we can discuss on our call.

Also, please let me know whether you intend to participate by phone or in person.
Thanks

Andrew

--
Andrew deLaski
Appliance Standards Awareness Project
www.appliance-standards.org
(617) 363-9470

Exhibit 18 - ORA-A1701013-PGE006
<021215>
https://docs.wixstatic.com/ugd/0c9650_6aaf51bf95ee4b9097b7490cb33718b9.pdf

From: Andrew deLaski
To: Mike Murza; Hunt, Marshall; Bijit Kundu; Charlie Stephens
Subject: Fwd: Furance Stakeholder Planning Meeting
Date: Thursday, February 12, 2015 9:46:23 AM

Mike, Marshall, Charlie and Bijit: NRDC is pulling together a meeting of our team tomorrow and with industry next week concerning the furnace standards. In the past you all have been only a little involved in the furnace standards work, but I wanted to check again to see if you want to participate in these upcoming meetings in whch we are working to find a way forward in this contentious docket. Do you want to participate in the call tomorrow and the meeting next Friday (presumably by phone)? Let me know and I'll ask NRDC to add you to the invite lists.

Andrew

---------- Forwarded message ----------
From: **Noll, Elizabeth** <enoll@nrdc.org>
Date: Thu, Feb 12, 2015 at 11:42 AM
Subject: Furance Stakeholder Planning Meeting
To: "Roy, Robin" <rroy@nrdc.org>, "Longstreth, Ben" <blongstreth@nrdc.org>, "Kennedy, Kit" <kkennedy@nrdc.org>, Andrew deLaski <adelaski@standardsasap.org>, "jmauer@standardsasap.org" <jmauer@standardsasap.org>, "Lis, David J." <djlis@neep.org>, Timothy Ballo <tballo@earthjustice.org>, Harvey Sachs <hsachs@aceee.org>, Steve Nadel <snadel@aceee.org>, Rodney Sobin <RSobin@ase.org>, Mel Hall-Crawford <melhc@consumerfed.org>, Charlie Harak <charak@nclc.org>

Discuss and prepare for broad stakeholder call on Feb. 20th.

Call: 2127274600
Participant code: 9866115

Discuss:

- Initial thoughts on NOPR
    - Strengths and weaknesses
- Agenda for Feb. 20th (in development)
- Other?

For those unable to participate tomorrow, please send me your thoughts so we can be sure to integrate them into the discussion and reflect them in the agenda for the 20th. And again please forward to anyone I may have missed.

Thanks
Elizabeth

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A ShoreTel conference call has been created for this meeting.
Use either of the following to join the call:
Call 4600 (Extension)
+12127274600 (Local dial in)
and enter the access code below followed by the # key.
Participant code: 9866115

Or, click the link below:
Participant: https://conf.nrdc.org/conference/9866115
Test link: https://conf.nrdc.org/test

Mobile Auto Dial:
VoIP: voip://+12127274600;9866115#
iOS devices: +12127274600,9866115 and press #
Other devices: +12127274600x9866115#

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Exhibit 19 - ORA-A1701013-PGE006
<061915>
https://docs.wixstatic.com/ugd/0c9650_b8a2f7bd75f140938b40f06ab4e1b2dc.pdf

From:	Andrew deLaski
To:	Marianne DiMascio
Cc:	Ben Longstreth; Brad Penney; Charlie Harak; David Goldstein; David J. Lis; Elizabeth Noll; Harvey Sachs; Jeff Harris; Joanna Mauer; Kit Kennedy; Kristen@Energy Priskell; Marshall Hunt; Hunt, Marshall; Mel Hall-Crawford; Mike Murza; Patrick@Energy Saxton; Robin Roy; Steve Nadel; Suzanne Watson; Timothy Ballo; Chris Granda
Subject:	draft agenda for today"s furnace call
Date:	Friday, June 19, 2015 11:04:56 AM
Attachments:	Furnace NOPR LCC & NIA Results (1).xlsx

Hello ASAP furnace TAG:

The purpose of our call this afternoon
(206-402-0821 9660261)
is to coordinate on written comments for the furnace docket, which are due on July 10.

Draft call agenda

1. Any updates on talks with industry? (I distributed notes on last week's meeting earlier this week.)

2. How do our talks with industry affect written comments?

3. Who plans to submit written comments?

4. Topics

a. What level to support:
- 92 v. 95
- regional v. national
- do we recommend a low btu class at 80AFUE? if so, regional or national? up to what btu/h input?

b. DOE cost estimates
- what information can we offer to support cost estimates equal or lower than DOE's?
* equipment
* venting

c. impacts on low income consumers

d. what else?

For everyone's convenience, I've attached here the summary of impacts at 92 and 95 national which Joanna put together and which we've circulated previously.

- Andrew

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On Wed, Jun 17, 2015 at 4:13 PM, Marianne DiMascio <mdimascio@standardsasap.org> wrote:

> Thanks for completing the doodle poll. Could you all tentatively hold Friday from 3-4:30 EST (12-1:30 PST) for the furnace call and we'll confirm in the morning?
>
> Marianne

On Tue, Jun 16, 2015 at 9:56 PM, Marianne DiMascio <mdimascio@standardsasap.org> wrote:

Hi all,

Here's the doodle poll for the call to coordinate July 10th comments to DOE. We are trying for this Friday, next Monday or Tuesday. Thanks for responding quickly.

http://doodle.com/d6csxkawwk2x9rzs

Marianne

On Tue, Jun 16, 2015 at 8:49 PM, Andrew deLaski <adelaski@standardsasap.org> wrote:

CONFIDENTIAL: Here's a report on last week's meeting with industry stakeholders and us. Key next step is to prepare our written comments for the DOE docket, due July 10. I know some of you have already commenced work on yours. I'm traveling tomorrow so have asked Marianne to get a poll around to find a call time. Please be on the lookout for that and respond as soon as you can. Thx.

Report on 6/11 furnace meeting

At the meeting last week, AGA proposed the following: 80% AFUE standard below 5000 HDD; 92% above. Furnaces at or below 80kbtu/h input would need to meet an 80% standard, regardless of region.

AHRI seconded the proposal for the 5000 HDD line, with 92% in the North and 80% in the south. AHRI also wants to allow 80% furnaces below a certain input capacity anywhere, but they did not have a position on the input capacity break point (previously, they also had said 80 kbtu/h)

On the other elements of our previous proposal, AHRI said:

#1. they are pulling the furnace fan efficiency proposal off the table (we estimated small savings potential, given the 2019 fan rule).

#2. they cannot support 81% AFUE for non-condensing furnaces.

#3. they did not mention the AC standards (separately, they've requested a formal reg neg on the next round of AC standards, which is likely to be approved tomorrow).

#4. they remain open to a provision related to learning thermostats, but have a lot of questions about how it would be done.

#5. they did not respond on the building code, saying they viewed it as a secondary issue to be worked out after the main issues (Note: FWIW - when the codes option came up, Craig Drumheller said that NAHB while not favoring it would not object if it were part of the package.)

#6. In response to our suggestion that we get more info on savings from modulating furnaces, several manufacturers in private said the energy savings are very small – the advantage of such units is comfort from more even heating.

The manufacturers expressed a strong preference for an approach that is simple.

AGA justified their position, in part, with an argument that they don't believe the DOE analysis has withstood the scrutiny of AGA's consultant (GTI) and that therefore the DOE proposal and any national standard in the condensing range is not cost-effective. They'll release that GTI critique of the DOE analysis as part of their written comments to the docket in early July. We need to be prepared to review, understand and critique it.

We responded to say that the AGA proposal was considerably short of what makes sense for consumers and energy savings. We said that there is some combination of north/south border, kbtu/h cut off for non-condensing products and condensing AFUE level (92 v 95), and ways to get additional savings from 80% furnaces that will allow for some non-condensing furnaces where they make economic sense and still deliver the large savings potential for this rule, but the AGA proposal does not come close to capturing it. All of these issues need to be further considered.

Steve shared his draft language on performance based approach for T-stats. This element achieves some of the savings lost by allowing some 80% furnaces.

The gas and furnace industries are going to review the performance based concept for T-stats.

We agreed to form a small technical working group on data issues that can help inform the kbtu/h cutoff, N-S line and 92 vs 95 AFUE issues, Harvey is our designee to that group and will convene that group.

AHRI asked if there was a quad target we had in mind for this rule. We said our goal is maximum cost effective savings, but would think about if we can reduce it to a quad number.

All sides said they'd like to continue working to see if a consensus can be reached. We also recognized that everyone would be focusing on their written comments to the docket in the near term now.

My sense is that our team needs to shift our full attention to preparing our written comments, which are due on July 10. To that end, please fill out the doodle poll Marianne will send around so we coordinate our written comments.

- Andrew

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