

Exhibit No: SCG-21
Docket No.: R.13-11-005
Witness: Cross-Exhibit



EXCERPTS FROM SOCALGAS PRODUCTION PROVIDED
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REQUEST ORA-HB-SCG-2018-09

July 16, 2018

SOUTHERN CALIFORNIA GAS COMPANY
ENERGY EFFICIENCY
TOTAL RESOURCE & PROGRAM ADMINISTRATOR COST
(DATA REQUEST ORA-HB-SCG-2018-09)

DATE RECEIVED: JUNE 29, 2018

DATE SUBMITTED: JULY 16, 2018

Preliminary Statement

For the purposes of these responses, SoCalGas understands the phrase “energy efficiency codes and standards advocacy” to mean conduct directly concerning statewide energy efficiency codes & standards advocacy, as delineated in Decision 18-05-041. The activities therefore do not include activities for local programs, such as compliance, reach codes, and engagement with the Department of Energy (“DOE”). See Decision (D.) 18-05-041 at 12, 91; SoCalGas Business Plan at 298, PG&E Business Plan at 548, Southern California Edison Business Plan at 224. In addition, SoCalGas has continued to monitor and be passively involved with statewide energy efficiency Codes & Standards advocacy. Therefore, the time, work, and personnel identified in the below responses include instances where SoCalGas employees were, for example, not “participating” in energy efficiency codes and standards (EECS) advocacy, but were merely present for a call. This understanding applies to all responses below unless it is stated otherwise.

QUESTION 1:

How many hours did SoCalGas personnel spend on energy efficiency codes and standards (EECS) advocacy activities from June 1, 2018 to June 5, 2018?

RESPONSE 1:

SoCalGas employees spent approximately 2 hours during the identified time period.

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(DATA REQUEST ORA-HB-SCG-2018-09)**

DATE RECEIVED: JUNE 29, 2018

DATE SUBMITTED: JULY 16, 2018

QUESTION 13:

Please provide any and all final or draft work products of EECS advocacy activities performed from June 1, 2018 through June 5, 2018. This should include documents that were written, partially written, revised, finalized, or sent on the days in question. Work products include, but are not limited to:

- a. Letters, comments, and testimony submitted to regulatory agencies
- b. Letters, talking points, briefings and lobbying documents provided to elected officials, regulatory officials, and the staff to those officials
- c. Fliers, articles, and press releases
- d. Meetings and phone calls (including requests for meetings or phone calls) with regulatory officials, regulatory agency staff, elected officials, and staff to elected officials. Please provide the date and time of the meeting, names and titles of all people involved, and the subject matter and purpose of the meeting.

RESPONSE 13:

SoCalGas incorporates the preliminary statement. However, SoCalGas is also providing responsive documents relating to federal DOE advocacy. See documents provided concurrently herewith, in Attachment A.

SOUTHERN CALIFORNIA GAS COMPANY
ENERGY EFFICIENCY
TOTAL RESOURCE & PROGRAM ADMINISTRATOR COST
(DATA REQUEST ORA-HB-SCG-2018-09)

DATE RECEIVED: JUNE 29, 2018

DATE SUBMITTED: JULY 16, 2018

QUESTION 14:

Please provide any and all final or draft work products of EECS advocacy activities performed on or after June 6, 2018. This should include documents that were written, partially written, revised, finalized, or sent on or after June 6, 2018. Work products include, but are not limited to:

- a. Letters, comments, and testimony submitted to regulatory agencies
- b. Letters, talking points, briefings and lobbying documents provided to elected officials, regulatory officials, and the staff to those officials
- c. Fliers, articles, and press releases
- d. Meetings and phone calls (including requests for meetings or phone calls) with regulatory officials, regulatory agency staff, elected officials, and staff to elected officials. Please provide the date and time of the meeting, names and titles of all people involved, and the subject matter and purpose of the meeting.

RESPONSE 14:

SoCalGas incorporates the preliminary statement. However, SoCalGas is also providing responsive documents relating to federal DOE advocacy. See documents provided concurrently herewith, in Attachment B.

**SOUTHERN CALIFORNIA GAS COMPANY
ENERGY EFFICIENCY
TOTAL RESOURCE & PROGRAM ADMINISTRATOR COST
(DATA REQUEST ORA-HB-SCG-2018-09)**

DATE RECEIVED: JUNE 29, 2018

DATE SUBMITTED: JULY 16, 2018

QUESTION 15:

Please provide any written or electronic correspondence with other investor-owned utilities in California regarding EECS advocacy that was sent or received on or after June 1, 2018.

RESPONSE 15:

SoCalGas incorporates the preliminary statement. However, SoCalGas is also providing responsive documents relating to federal DOE advocacy. See documents provided concurrently herewith, in Attachment C.

**SOUTHERN CALIFORNIA GAS COMPANY
ENERGY EFFICIENCY
TOTAL RESOURCE & PROGRAM ADMINISTRATOR COST
(DATA REQUEST ORA-HB-SCG-2018-09)**

DATE RECEIVED: JUNE 29, 2018

DATE SUBMITTED: JULY 16, 2018

QUESTION 16:

Please provide information about any phone conversations or in-person meetings with other investor-owned utilities in California that were related to EECS advocacy, and occurred on or after June 1, 2018.

- a. Date and time
- b. Name and title of all people involved
- c. Subject matter and purpose of the meeting

RESPONSE 16:

SoCalGas incorporates the preliminary statement. However, SoCalGas is also providing responsive documents relating to federal DOE advocacy. See documents provided concurrently herewith, in Attachment D.

ATTACHMENT C

Mendoza, Ray J

From: Cunningham, Kelly <KACV@pge.com>
Sent: Friday, June 8, 2018 4:26 PM
To: Mendoza, Ray J
Subject: [EXTERNAL] RE: Review of bidders on multifamily RFP

Thank you for letting me know today!

Kelly

Kelly Cunningham / Codes & Standards / 530-757-5271 (desk) / 530-574-8756 (mobile)

From: Mendoza, Ray J [mailto:RJMendo1@semprautilities.com]
Sent: Friday, June 08, 2018 4:23 PM
To: Cunningham, Kelly
Subject: RE: Review of bidders on multifamily RFP

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

Hi Kelly,

I will have to respectfully decline the opportunity to serve on the team to score the responses of the RFPs.

Thank you,

Ray Mendoza

Programs Advisor
Southern California Gas Co.
Energy Resource Center / M.L. SCERC1
Phone: 562-803-7493

 Please consider the environment before printing this e-mail.

From: Cunningham, Kelly [mailto:KACV@pge.com]
Sent: Thursday, June 7, 2018 11:59 AM
To: Mendoza, Ray J <RJMendo1@semprautilities.com>
Cc: Eilert, Patrick <PLE2@pge.com>
Subject: [EXTERNAL] Review of bidders on multifamily RFP

Ray,

The proposals are in from the 2022 Multifamily RFP. Can you serve on the team to score the responses? There will be an NDA to sign to participate, per our sourcing lead. Can you let me know if you can participate or whether you would like to pass, having reviewed the RFP itself before?

If you can reply today if possible, I would greatly appreciate it.

If you cannot reply with such short notice, just let me know when you could reply.

I would like to offer a full team list to our sourcing department as soon as possible.

Thank you,
Kelly

Kelly Cunningham / Codes & Standards / 530-757-5271 (desk) / 530-574-8756 (mobile)

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<http://www.pge.com/en/about/company/privacy/customer/index.page>

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

Mendoza, Ray J

From: Barbour, John L
Sent: Monday, June 18, 2018 10:41 AM
To: Alanna Torres
Cc: ple2@pge.com; Michelle.Thomas@sce.com; Zeng, Kate; Manke, Adam P; Bijit Kundu; Chad Worth; Barbour, John L; Reefer, Jeremy; M3AK@pge.com; charles.kim@sce.com; randall.higa@sce.com; Mendoza, Ray J
Subject: RE: APPROVAL REQUEST June 22: Residential Dishwashers Comment Letter
Attachments: Res Dishwasher_Comment Letter__6.15.18 JB.DOCX

Importance: High

Alanna,

I see you have most the utilities have sent approvals. Nevertheless, I have reviewed the Residential Dishwashers Comment Letter and have a few suggestions for improvements (see attached).

Please call me if you have any question.

Thank you,

John Barbour
SDG&E
858-654-1110 office
916-893-4591 cell

From: Alanna Torres [mailto:atorres@energy-solution.com]
Sent: Friday, June 15, 2018 1:06 PM
To: M3AK@pge.com; charles.kim@sce.com; randall.higa@sce.com; Barbour, John L <JBarbour@semprautilities.com>; Mendoza, Ray J <RJMendo1@semprautilities.com>; Reefer, Jeremy <JMReefe@semprautilities.com>
Cc: ple2@pge.com; Michelle.Thomas@sce.com; Zeng, Kate <KZeng@semprautilities.com>; Manke, Adam P <AManke@semprautilities.com>; Bijit Kundu <BKundu@energy-solution.com>; Chad Worth <cworth@energy-solution.com>
Subject: [EXTERNAL] APPROVAL REQUEST June 22: Residential Dishwashers Comment Letter

All,

Please see attached a draft comment letter in response to Notification of Petition for Rulemaking issued regarding the **Energy Conservation Standards for Residential Dishwashers**. This draft letter reflects the comments outlined in the review form, which is also attached for your reference.

The approval deadline is **Friday, June 22nd**. We are requesting all feedback is provided by **Wednesday June 20th** so we can distribute a final letter for approval. Please let me know if you think your organization will have trouble meeting this deadline.

Thank you,

Alanna Torres | Project Manager II | atorres@energy-solution.com | (510) 482-4420 x279 | [449 15th St, Oakland, CA 94612](https://www.energy-solution.com)



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Mendoza, Ray J

From: Eilert, Patrick <PLE2@pge.com>
Sent: Friday, June 15, 2018 6:17 PM
To: Michelle Thomas; Alanna Torres; Anderson, Mary; Charles Kim; Randall Higa; Barbour, John L; Mendoza, Ray J; Reefer, Jeremy
Cc: Zeng, Kate; Manke, Adam P; Bijit Kundu; Chad Worth
Subject: [EXTERNAL] Re: (External):APPROVAL REQUEST June 22: Residential Dishwashers Comment Letter

PG&E approves. Thanks.

Get [Outlook for iOS](#)

From: Michelle Thomas <Michelle.Thomas@sce.com>
Sent: Friday, June 15, 2018 1:17:51 PM
To: Alanna Torres; Anderson, Mary; Charles Kim; Randall Higa; JBarbour@semprautilities.com; RJMendo1@semprautilities.com; JMReefe@semprautilities.com
Cc: Eilert, Patrick; KZeng@semprautilities.com; AManke@semprautilities.com; Bijit Kundu; Chad Worth
Subject: RE: (External):APPROVAL REQUEST June 22: Residential Dishwashers Comment Letter

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

SCE approves.

From: Alanna Torres [mailto:atorres@energy-solution.com]
Sent: Friday, June 15, 2018 1:06 PM
To: M3AK@pge.com; Charles Kim <Charles.Kim@sce.com>; Randall Higa <Randall.Higa@sce.com>; JBarbour@semprautilities.com; RJMendo1@semprautilities.com; JMReefe@semprautilities.com
Cc: ple2@pge.com; Michelle Thomas <Michelle.Thomas@sce.com>; KZeng@semprautilities.com; AManke@semprautilities.com; Bijit Kundu <BKundu@energy-solution.com>; Chad Worth <cworth@energy-solution.com>
Subject: (External):APPROVAL REQUEST June 22: Residential Dishwashers Comment Letter

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Thank you,

Alanna Torres | Project Manager II | atorres@energy-solution.com | (510) 482-4420 x279 | <449 15th St, Oakland, CA 94612>



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<http://www.pge.com/en/about/company/privacy/customer/index.page>

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

Mendoza, Ray J

From: Michelle Thomas <Michelle.Thomas@sce.com>
Sent: Friday, June 15, 2018 1:18 PM
To: Alanna Torres; M3AK@pge.com; Charles Kim; Randall Higa; Barbour, John L; Mendoza, Ray J; Reeve, Jeremy
Cc: ple2@pge.com; Zeng, Kate; Manke, Adam P; Bijit Kundu; Chad Worth
Subject: [EXTERNAL] RE: (External):APPROVAL REQUEST June 22: Residential Dishwashers Comment Letter

SCE approves.

From: Alanna Torres [mailto:atorres@energy-solution.com]
Sent: Friday, June 15, 2018 1:06 PM
To: M3AK@pge.com; Charles Kim <Charles.Kim@sce.com>; Randall Higa <Randall.Higa@sce.com>; JBarbour@semprautilities.com; RJMendo1@semprautilities.com; JMReefe@semprautilities.com
Cc: ple2@pge.com; Michelle Thomas <Michelle.Thomas@sce.com>; KZeng@semprautilities.com; AManke@semprautilities.com; Bijit Kundu <BKundu@energy-solution.com>; Chad Worth <cworth@energy-solution.com>
Subject: (External):APPROVAL REQUEST June 22: Residential Dishwashers Comment Letter

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Thank you,

Alanna Torres | Project Manager II | atorres@energy-solution.com | (510) 482-4420 x279 | [449 15th St, Oakland, CA 94612](#)



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Mendoza, Ray J

From: Alanna Torres <atorres@energy-solution.com>
Sent: Thursday, June 21, 2018 12:03 PM
To: M3AK@pge.com; charles.kim@sce.com; randall.higa@sce.com; Barbour, John L; Mendoza, Ray J; Reefer, Jeremy
Cc: ple2@pge.com; Michelle.Thomas@sce.com; Zeng, Kate; Manke, Adam P; Bijit Kundu; Chad Worth
Subject: [EXTERNAL] RE: APPROVAL REQUEST June 22: Residential Dishwashers Comment Letter
Attachments: Your Comment Submitted on Regulations.gov (ID: EERE-2018-BT-STD-0005-0001); Res Dishwasher_Comment Letter_Final.pdf

Good afternoon,

We've received all approvals of the letter and it has been submitted to the docket. Please see attached for the letter as well as the email confirmation of submittal.

Thank you.

Alanna Torres | o: (510) 482-4420 x279

From: Mendoza, Ray J [mailto:RJMendo1@semprautilities.com]
Sent: Thursday, June 21, 2018 9:02 AM
To: Alanna Torres <atorres@energy-solution.com>
Subject: RE: APPROVAL REQUEST June 22: Residential Dishwashers Comment Letter

Hi Alanna, I thought I had already sent our approval through, my apologies. SoCalGas approves.

Thank you,

Ray Mendoza

Programs Advisor
Southern California Gas Co.
Energy Resource Center / M.L. SCERC1
Phone: 562-803-7493

 Please consider the environment before printing this e-mail.

From: Alanna Torres [mailto:atorres@energy-solution.com]
Sent: Wednesday, June 20, 2018 5:25 PM
To: M3AK@pge.com; charles.kim@sce.com; randall.higa@sce.com; Barbour, John L <JBarbour@semprautilities.com>; Mendoza, Ray J <RJMendo1@semprautilities.com>; Reefer, Jeremy <JMReefe@semprautilities.com>
Cc: ple2@pge.com; Michelle.Thomas@sce.com; Zeng, Kate <KZeng@semprautilities.com>; Manke, Adam P <AManke@semprautilities.com>; Bijit Kundu <BKundu@energy-solution.com>; Chad Worth <cworth@energy-solution.com>
Subject: [EXTERNAL] RE: APPROVAL REQUEST June 22: Residential Dishwashers Comment Letter

Good afternoon,

Thank you for everyone who provided comments. Please see the attached version which includes some clarifying updates as well as the survey data from Mary.

I've received approval via email from PG&E, SDG&E, and SCE, please let me know if SoCalGas will be approving this comment letter.

Thanks.

Alanna Torres | o: (510) 482-4420 x279

From: Alanna Torres
Sent: Friday, June 15, 2018 1:06 PM
To: 'M3AK@pge.com' <M3AK@pge.com>; 'charles.kim@sce.com' <charles.kim@sce.com>; 'randall.higa@sce.com' <randall.higa@sce.com>; 'JBarbour@semprautilities.com' <JBarbour@semprautilities.com>; 'RJMendo1@semprautilities.com' <RJMendo1@semprautilities.com>; 'JMReefe@semprautilities.com' <JMReefe@semprautilities.com>
Cc: ple2@pge.com; 'Michelle.Thomas@sce.com' <Michelle.Thomas@sce.com>; 'KZeng@semprautilities.com' <KZeng@semprautilities.com>; 'AManke@semprautilities.com' <AManke@semprautilities.com>; Bijit Kundu <bkundu@energy-solution.com>; Chad Worth <cworth@energy-solution.com>
Subject: APPROVAL REQUEST June 22: Residential Dishwashers Comment Letter

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Thank you,

Alanna Torres | Project Manager II | atorres@energy-solution.com | (510) 482-4420 x279 | 449 15th St, Oakland, CA 94612



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Mendoza, Ray J

From: Alanna Torres <atorres@energy-solution.com>
Sent: Wednesday, June 20, 2018 5:25 PM
To: M3AK@pge.com; charles.kim@sce.com; randall.higa@sce.com; Barbour, John L; Mendoza, Ray J; Reeve, Jeremy
Cc: ple2@pge.com; Michelle.Thomas@sce.com; Zeng, Kate; Manke, Adam P; Bijit Kundu; Chad Worth
Subject: [EXTERNAL] RE: APPROVAL REQUEST June 22: Residential Dishwashers Comment Letter
Attachments: Res Dishwasher_Comment Letter__Draft 6.20.18.docx

Good afternoon,

Thank you for everyone who provided comments. Please see the attached version which includes some clarifying updates as well as the survey data from Mary.

I've received approval via email from PG&E, SDG&E, and SCE, please let me know if SoCalGas will be approving this comment letter.

Thanks.

Alanna Torres | o: (510) 482-4420 x279

From: Alanna Torres
Sent: Friday, June 15, 2018 1:06 PM
To: 'M3AK@pge.com' <M3AK@pge.com>; 'charles.kim@sce.com' <charles.kim@sce.com>; 'randall.higa@sce.com' <randall.higa@sce.com>; 'JBarbour@semprautilities.com' <JBarbour@semprautilities.com>; 'RJMendo1@semprautilities.com' <RJMendo1@semprautilities.com>; 'JMReefe@semprautilities.com' <JMReefe@semprautilities.com>
Cc: ple2@pge.com; 'Michelle.Thomas@sce.com' <Michelle.Thomas@sce.com>; 'KZeng@semprautilities.com' <KZeng@semprautilities.com>; 'AManke@semprautilities.com' <AManke@semprautilities.com>; Bijit Kundu <bkundu@energy-solution.com>; Chad Worth <cworth@energy-solution.com>
Subject: APPROVAL REQUEST June 22: Residential Dishwashers Comment Letter

All,

Please see attached a draft comment letter in response to Notification of Petition for Rulemaking issued regarding the **Energy Conservation Standards for Residential Dishwashers**. This draft letter reflects the comments outlined in the review form, which is also attached for your reference.

The approval deadline is **Friday, June 22nd**. We are requesting all feedback is provided by **Wednesday June 20th** so we can distribute a final letter for approval. Please let me know if you think your organization will have trouble meeting this deadline.

Thank you,

Alanna Torres | Project Manager II | atorres@energy-solution.com | (510) 482-4420 x279 | [449 15th St, Oakland, CA 94612](http://449.15th.St.Oakland.CA.94612)



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Mendoza, Ray J

From: Alanna Torres <atorres@energy-solution.com>
Sent: Friday, June 15, 2018 1:06 PM
To: M3AK@pge.com; charles.kim@sce.com; randall.higa@sce.com; Barbour, John L; Mendoza, Ray J; Reeve, Jeremy
Cc: ple2@pge.com; Michelle.Thomas@sce.com; Zeng, Kate; Manke, Adam P; Bijit Kundu; Chad Worth
Subject: [EXTERNAL] APPROVAL REQUEST June 22: Residential Dishwashers Comment Letter
Attachments: One Page Review Form_Res Dishwasher Petition_6-1-2018.docx; Res Dishwasher_Comment Letter__6.15.18.docx

All,

Please see attached a draft comment letter in response to Notification of Petition for Rulemaking issued regarding the **Energy Conservation Standards for Residential Dishwashers**. This draft letter reflects the comments outlined in the review form, which is also attached for your reference.

The approval deadline is **Friday, June 22nd**. We are requesting all feedback is provided by **Wednesday June 20th** so we can distribute a final letter for approval. Please let me know if you think your organization will have trouble meeting this deadline.

Thank you,

Alanna Torres | Project Manager II | atorres@energy-solution.com | (510) 482-4420 x279 | [449 15th St, Oakland, CA 94612](#)



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Mendoza, Ray J

From: Bijit Kundu <BKundu@energy-solution.com>
Sent: Thursday, June 7, 2018 3:54 PM
To: Alanna Torres; Mendoza, Ray J; Reefe, Jeremy; M3AK@pge.com; Barbour, John L; Charles.Kim@sce.com; Chad Worth
Cc: bo@negawattconsult.com; marc@negawattconsult.com
Subject: [EXTERNAL] RE: Call for Comment Letter on Res Dishwasher Petition

All,

Thanks for those of you who could join the call this afternoon. Please see below the rough notes from our discussion.

Comment Letter Review Form on Res Dishwasher Petition

June 7, 2018

Mary Anderson (PG&E)
John Barbour (SDG&E)
Ray Mendoza (SoCalGas)
Bo White (Negawatt)
Alanna Torres, Chad Worth, Bijit Kundu (Energy Solutions)

Overview

AT: Background on petition - CEI petition DOE to create a new product class for residential dishwashers with a cycle time of less than an hour.

MA: CEI is a Koch Bros funded organization with the lens of consumers

MA: Lobbying at DOE led to this DOE notice

Proposed Comments

1. The petition to create a new product class with a likely weaker standard violates the anti-backsliding provision.
 2. The petition sets a dangerous precedent to define a product class based on customer preferences, such as cycle time, which has never been used to define a product class for any product.
 3. There are at numerous products on the market with multiple consumer selected cycles, including the option to run shorter cycles, so it is unclear why a separate product class is needed.
 4. There is evidence that not all efficiency gains come at the expense of cycle time. The largest increase of cycle times (35 minutes) came between 1995 and 2009 when there were no DOE standard updates.
 5. The average cycles/year and load shape information for dishwashers implies that consumers don't perform more than one cycle per day, so cycle time should be less of a concern.
- MA: Will provide data on # loads and consumer choice information and will provide that information one week in advance of the comment deadline.
6. The petition has not provided sufficient data to show that one-hour cycle times are even technically feasible as even before standards, average cycle times were greater than 70 minutes in 1983 according to consumer reports.
- MA: Is there any information on products with cycles times 60 min or less.
 - ES: Plan to look at Consumer Reports. Look at European models.
 - ES: Will check in with EJ re: legal aspect
 - BW: Look at the settings in the test procedure as well.

Timing

- ES: Will distribute June 15, one week before the approval deadline of June 22.

Thanks,

-----Original Appointment-----

From: Alanna Torres

Sent: Monday, June 4, 2018 9:52 AM

To: Alanna Torres; rjmendo1@semprautilities.com; JMReefe@semprautilities.com; M3AK@pge.com; JBarbour@semprautilities.com; Charles.Kim@sce.com; Bijit Kundu; Chad Worth

Cc: bo@negawattconsult.com; marc@negawattconsult.com

Subject: Call for Comment Letter on Res Dishwasher Petition

When: Thursday, June 7, 2018 3:00 PM-4:00 PM (UTC-08:00) Pacific Time (US & Canada).

Where: Conference Call

Agenda: review the one-page review form and potential comments due to the DOE on Monday June 25th and Mary to provide an update on dishwasher meter and survey data

To Join the Audio Portion - -

At the scheduled date and time please call:

Please call 510-858-5509

When prompted, enter the following Conference ID: 28122899, followed by # key.

<< File: One Page Review Form_Res Dishwasher Petition_6-1-2018.docx >>

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Mendoza, Ray J

From: Anderson, Mary <M3AK@pge.com>
Sent: Monday, June 4, 2018 10:58 AM
To: Saxton, Patrick@Energy; Barbour, John L; Reefer, Jeremy; Mendoza, Ray J; Charles Kim; Chad Worth
Cc: Alanna Torres; Bijit Kundu
Subject: [EXTERNAL] RE: DOE Dishwasher Collaboration with the CEC Notes

Excellent idea. I will add that to the question right now.

From: Saxton, Patrick@Energy [mailto:Patrick.Saxton@energy.ca.gov]
Sent: Monday, June 04, 2018 10:47 AM
To: Anderson, Mary <M3AK@pge.com>; John Barbor <JBarbour@semprautilities.com>; Reefer, Jeremy <JMReefe@semprautilities.com>; RJMendo1@semprautilities.com; Charles Kim <Charles.Kim@sce.com>; Chad Worth <cworth@energy-solution.com>
Cc: Alanna Torres <atorres@energy-solution.com>; Bijit Kundu <BKundu@energy-solution.com>
Subject: RE: DOE Dishwasher Collaboration with the CEC Notes

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Thanks Mary. Again my apologies for missing the meeting.

If you proceed with the Field Study pulse survey, you might consider adding cleaning performance to the list of features for ranking.

From: Anderson, Mary <M3AK@pge.com>
Sent: Monday, June 04, 2018 10:11 AM
To: Saxton, Patrick@Energy <Patrick.Saxton@energy.ca.gov>; John Barbor <JBarbour@semprautilities.com>; Reefer, Jeremy <JMReefe@semprautilities.com>; RJMendo1@semprautilities.com; Charles Kim <Charles.Kim@sce.com>; Chad Worth <cworth@energy-solution.com>
Cc: Alanna Torres <atorres@energy-solution.com>; Bijit Kundu <BKundu@energy-solution.com>
Subject: DOE Dishwasher Collaboration with the CEC Notes

CEC –
SDG&E – John
SCG – Ray
SCE –
PG&E – Mary
ES – Alanna, Chad, Bijit

Notes

- Interested in getting the load shape data on dishwasher, not sure if it will help the argument but could potentially help
- Potentially could say we agree that manufacturers should find methods to make dishwashers quicker while meeting the standard
- Mary is going to try and get a question in the Field Study pulse survey asking customers to rank what is more important in a dishwasher – cycle time, efficiency or sound.

Mary Anderson
PG&E | Expert Program Manager
3401 Crow Canyon Road, Building 414 | San Ramon, CA 94583 | Mail Code: BLDG 414
Phone: 415.603.1817

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Mendoza, Ray J

From: Saxton, Patrick@Energy <Patrick.Saxton@energy.ca.gov>
Sent: Monday, June 4, 2018 10:47 AM
To: Anderson, Mary; Barbour, John L; Reeve, Jeremy; Mendoza, Ray J; Charles Kim; Chad Worth
Cc: Alanna Torres; Bijit Kundu
Subject: [EXTERNAL] RE: DOE Dishwasher Collaboration with the CEC Notes

Thanks Mary. Again my apologies for missing the meeting.

If you proceed with the Field Study pulse survey, you might consider adding cleaning performance to the list of features for ranking.

From: Anderson, Mary <M3AK@pge.com>
Sent: Monday, June 04, 2018 10:11 AM
To: Saxton, Patrick@Energy <Patrick.Saxton@energy.ca.gov>; John Barbor <JBarbour@semprautilities.com>; Reeve, Jeremy <JMReeve@semprautilities.com>; RJMendo1@semprautilities.com; Charles Kim <Charles.Kim@sce.com>; Chad Worth <cworth@energy-solution.com>
Cc: Alanna Torres <atorres@energy-solution.com>; Bijit Kundu <BKundu@energy-solution.com>
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Sent: Monday, June 4, 2018 10:11 AM
To: Patrick.Saxton@energy.ca.gov; Barbour, John L; Reefe, Jeremy; Mendoza, Ray J; Charles Kim; Chad Worth
Cc: Alanna Torres; Bijit Kundu
Subject: [EXTERNAL] DOE Dishwasher Collaboration with the CEC Notes

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SDG&E – John
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Mendoza, Ray J

From: Marc Esser <marc@negawattconsult.com>
Sent: Monday, June 4, 2018 9:44 AM
To: Mendoza, Ray J
Cc: Bo White
Subject: [EXTERNAL] Re: Re: dishwasher petition

Sounds good, thanks for the heads up.

On Mon, Jun 4, 2018, 09:42 Mendoza, Ray J <RJMendo1@semprautilities.com> wrote:

Hi Marc,

Mary put together a last minute call on this topic for this morning. CEC is asking for some data from field studies that have been done. Specifically run times, how often, and what time of day. Mary is putting out a survey tomorrow to gather this data and we will reconvene to discuss. I will invite you all, since ES was on this morning's call.

Ray Mendoza

Programs Advisor

Southern California Gas Co.

Energy Resource Center / M.L. SCERC1

Phone: 562-803-7493

 *Please consider the environment before printing this e-mail.*

From: Marc Esser [mailto:marc@negawattconsult.com]
Sent: Wednesday, May 30, 2018 1:10 PM
To: Mendoza, Ray J <RJMendo1@semprautilities.com>
Cc: Bo White <bo@negawattconsult.com>
Subject: [EXTERNAL] Re: dishwasher petition

Hi Ray,

same question than I just posed in another email... any direction for us on this issue? The deadline for comments is also June 25.

Thank you

Marc

On Fri, May 11, 2018 at 2:36 PM, Marc Esser <marc@negawattconsult.com> wrote:

Ray,

for reference, this is about

<https://www.regulations.gov/document?D=EERE-2018-BT-STD-0005-0001>

I was mistaken regarding what I thought this was about, apologies for my confusion.

CEI is petitioning DOE to introduce a new *residential dishwasher* product class, defined by a cycle time of 1 hour or less.

This is in response to alleged consumer complaints that dishwashers complying with the current energy conservation standard have excessively long cycle times. They do have long cycle times, because with less water and lower temperature water, it takes longer to get the dishes clean.

CEI does not propose a particular energy or water efficiency for the new product class, but asserts that can be established by DOE standard procedure as part of the rulemaking. It can be expected that this new type of dishwasher would use more water and energy than current models, probably significantly so.

One way to look at this is that CEI is trying to create a way to circumvent the anti-backsliding provisions and current standard for a product that would sell well to affluent / demanding consumers, who don't care about energy and water efficiency.

Another point of view - CEI's - is that DOE has tightened the standards over the years to the point where dishwashers no longer are what they used be, in terms of performance characteristics and features, which DOE is prohibited from doing, and which upsets consumers and hence the market.

I think the CA IOUs should comment on this petition. I don't have an opinion yet, except that I don't like that, if introduced, the new products would effectively undo of decades of dishwasher efficiency progress.

Marc

--

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

Mendoza, Ray J

From: Saxton, Patrick@Energy <Patrick.Saxton@energy.ca.gov>
Sent: Monday, June 4, 2018 9:43 AM
To: Anderson, Mary; Barbour, John L; Reeve, Jeremy; Mendoza, Ray J; Charles Kim; Chad Worth
Subject: [EXTERNAL] RE: DOE Dishwasher Collaboration with the CEC

My apologies to everyone. This completely fell off of my radar and I totally forgot about this meeting.

Sorry,

Pat

-----Original Appointment-----

From: Anderson, Mary <M3AK@pge.com>
Sent: Thursday, May 31, 2018 5:28 PM
To: Anderson, Mary; Saxton, Patrick@Energy; John Barbor; Reeve, Jeremy (JMReeve@semprautilities.com); 'RJMendo1@semprautilities.com'; Charles Kim; Chad Worth
Subject: DOE Dishwasher Collaboration with the CEC
When: Monday, June 04, 2018 9:00 AM-10:00 AM (UTC-08:00) Pacific Time (US & Canada).
Where: Conference Call

Mary Anderson invites you to an online meeting using WebEx.

Meeting Number: 744 389 814
Meeting Password: This meeting does not require a password.

To join this meeting

1. Go to <https://pge.webex.com/pge/j.php?MTID=m722128848fce1a7efc61277f4c34955d>
2. If requested, enter your name and email address.
3. If a password is required, enter the meeting password: This meeting does not require a password.
4. Click "Join".
5. Follow the instructions that appear on your screen.

Audio conference information

To receive a call back, provide your phone number when you join the meeting, or call the number below and enter the access code.
US Toll Free: +1 800 603 7556

Having trouble dialing in? Try these backup numbers:
US Toll Free: +1 800 603 7556
US Toll: +1 270 240 0886

Access code:744 389 814
Global call-in numbers: <https://pge.webex.com/pge/globalcallin.php?serviceType=MC&ED=695857892&tollFree=1>
Toll-free dialing restrictions: https://www.webex.com/pdf/tollfree_restrictions.pdf

***ONLY for Conference Room access ***

JOIN FROM A VIDEO CONFERENCING SYSTEM OR APPLICATION

Dial [sip:744389814@pge.webex.com](tel:sip:744389814@pge.webex.com)

<https://www.webex.com>

IMPORTANT NOTICE: This WebEx service includes a feature that allows audio and any documents and other materials exchanged or viewed during the session to be recorded. By joining this session, you automatically consent to such recordings. If you do not consent to the recording, discuss your concerns with the meeting host prior to the start of the recording or do not join the session. Please note that any such recordings may be subject to discovery in the event of litigation.

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Mendoza, Ray J


From: Mendoza, Ray J
Sent: Thursday, June 21, 2018 9:02 AM
To: 'Alanna Torres'
Subject: RE: APPROVAL REQUEST June 22: Residential Dishwashers Comment Letter

Hi Alanna, I thought I had already sent our approval through, my apologies. SoCalGas approves.

Thank you,

Ray Mendoza

Programs Advisor
Southern California Gas Co.
Energy Resource Center / M.L. SCERC1
Phone: 562-803-7493

 Please consider the environment before printing this e-mail.

From: Alanna Torres [mailto:atorres@energy-solution.com]
Sent: Wednesday, June 20, 2018 5:25 PM
To: M3AK@pge.com; charles.kim@sce.com; randall.higa@sce.com; Barbour, John L <JBarbour@semprautilities.com>; Mendoza, Ray J <RJMendo1@semprautilities.com>; Reefe, Jeremy <JMReefe@semprautilities.com>
Cc: ple2@pge.com; Michelle.Thomas@sce.com; Zeng, Kate <KZeng@semprautilities.com>; Manke, Adam P <AManke@semprautilities.com>; Bijit Kundu <BKundu@energy-solution.com>; Chad Worth <cworth@energy-solution.com>
Subject: [EXTERNAL] RE: APPROVAL REQUEST June 22: Residential Dishwashers Comment Letter

Good afternoon,

Thank you for everyone who provided comments. Please see the attached version which includes some clarifying updates as well as the survey data from Mary.

I've received approval via email from PG&E, SDG&E, and SCE, please let me know is SoCalGas will be approving this comment letter.

Thanks.

Alanna Torres | o: (510) 482-4420 x279

From: Alanna Torres
Sent: Friday, June 15, 2018 1:06 PM
To: 'M3AK@pge.com' <M3AK@pge.com>; 'charles.kim@sce.com' <charles.kim@sce.com>; 'randall.higa@sce.com' <randall.higa@sce.com>; 'JBarbour@semprautilities.com' <JBarbour@semprautilities.com>; 'RJMendo1@semprautilities.com' <RJMendo1@semprautilities.com>; 'JMReefe@semprautilities.com' <JMReefe@semprautilities.com>
Cc: ple2@pge.com; 'Michelle.Thomas@sce.com' <Michelle.Thomas@sce.com>; 'KZeng@semprautilities.com' <KZeng@semprautilities.com>; 'AManke@semprautilities.com' <AManke@semprautilities.com>; Bijit Kundu <bkundu@energy-solution.com>; Chad Worth <cworth@energy-solution.com>
Subject: APPROVAL REQUEST June 22: Residential Dishwashers Comment Letter

All,

Please see attached a draft comment letter in response to Notification of Petition for Rulemaking issued regarding the **Energy Conservation Standards for Residential Dishwashers**. This draft letter reflects the comments outlined in the review form, which is also attached for your reference.

The approval deadline is **Friday, June 22nd**. We are requesting all feedback is provided by **Wednesday June 20th** so we can distribute a final letter for approval. Please let me know if you think your organization will have trouble meeting this deadline.

Thank you,

Alanna Torres | Project Manager II | atorres@energy-solution.com | (510) 482-4420 x279 | [449 15th St, Oakland, CA 94612](https://www.google.com/maps/place/449+15th+St,+Oakland,+CA+94612)



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

Mendoza, Ray J

From: Barbour, John L
Sent: Monday, June 18, 2018 10:41 AM
To: Alanna Torres
Cc: ple2@pge.com; Michelle.Thomas@sce.com; Zeng, Kate; Manke, Adam P; Bijit Kundu; Chad Worth; Barbour, John L; Reefer, Jeremy; M3AK@pge.com; charles.kim@sce.com; randall.higa@sce.com; Mendoza, Ray J
Subject: RE: APPROVAL REQUEST June 22: Residential Dishwashers Comment Letter
Attachments: Res Dishwasher_Comment Letter__6.15.18 JB.DOCX

Importance: High

Alanna,

I see you have most the utilities have sent approvals. Nevertheless, I have reviewed the Residential Dishwashers Comment Letter and have a few suggestions for improvements (see attached).

Please call me if you have any question.

Thank you,

John Barbour
SDG&E
858-654-1110 office
916-893-4591 cell

From: Alanna Torres [mailto:atorres@energy-solution.com]
Sent: Friday, June 15, 2018 1:06 PM
To: M3AK@pge.com; charles.kim@sce.com; randall.higa@sce.com; Barbour, John L <JBarbour@semprautilities.com>; Mendoza, Ray J <RJMendo1@semprautilities.com>; Reefer, Jeremy <JMReefe@semprautilities.com>
Cc: ple2@pge.com; Michelle.Thomas@sce.com; Zeng, Kate <KZeng@semprautilities.com>; Manke, Adam P <AManke@semprautilities.com>; Bijit Kundu <BKundu@energy-solution.com>; Chad Worth <cworth@energy-solution.com>
Subject: [EXTERNAL] APPROVAL REQUEST June 22: Residential Dishwashers Comment Letter

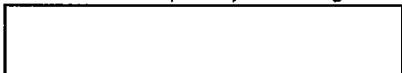
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Alanna Torres | Project Manager II | atorres@energy-solution.com | (510) 482-4420 x279 | [449 15th St, Oakland, CA 94612](http://449_15th_St_Oakland_CA_94612)



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Mendoza, Ray J

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Sent: Friday, June 15, 2018 1:06 PM
To: M3AK@pge.com; charles.kim@sce.com; randall.higa@sce.com; Barbour, John L; Mendoza, Ray J; Reefer, Jeremy
Cc: ple2@pge.com; Michelle.Thomas@sce.com; Zeng, Kate; Manke, Adam P; Bijit Kundu; Chad Worth
Subject: [EXTERNAL] APPROVAL REQUEST June 22: Residential Dishwashers Comment Letter
Attachments: One Page Review Form_Res Dishwasher Petition_6-1-2018.docx; Res Dishwasher_Comment Letter_6.15.18.docx

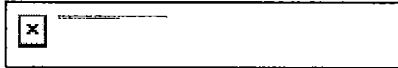
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Sent: Wednesday, June 20, 2018 5:25 PM
To: M3AK@pge.com; charles.kim@sce.com; randall.higa@sce.com; Barbour, John L; Mendoza, Ray J; Reefe, Jeremy
Cc: ple2@pge.com; Michelle.Thomas@sce.com; Zeng, Kate; Manke, Adam P; Bijit Kundu; Chad Worth
Subject: [EXTERNAL] RE: APPROVAL REQUEST June 22: Residential Dishwashers Comment Letter
Attachments: Res Dishwasher_Comment Letter__Draft 6.20.18.docx

Good afternoon,

Thank you for everyone who provided comments. Please see the attached version which includes some clarifying updates as well as the survey data from Mary.

I've received approval via email from PG&E, SDG&E, and SCE, please let me know if SoCalGas will be approving this comment letter.

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Alanna Torres | o: (510) 482-4420 x279

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To: 'M3AK@pge.com' <M3AK@pge.com>; 'charles.kim@sce.com' <charles.kim@sce.com>; 'randall.higa@sce.com' <randall.higa@sce.com>; 'JBarbour@semprautilities.com' <JBarbour@semprautilities.com>; 'RJMendo1@semprautilities.com' <RJMendo1@semprautilities.com>; 'JMReefe@semprautilities.com' <JMReefe@semprautilities.com>
Cc: ple2@pge.com; 'Michelle.Thomas@sce.com' <Michelle.Thomas@sce.com>; 'KZeng@semprautilities.com' <KZeng@semprautilities.com>; 'AManke@semprautilities.com' <AManke@semprautilities.com>; Bijit Kundu <bkundu@energy-solution.com>; Chad Worth <cworth@energy-solution.com>
Subject: APPROVAL REQUEST June 22: Residential Dishwashers Comment Letter

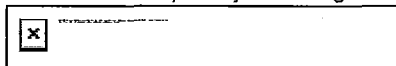
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July 6, 2018

Deleted: June 18, 2018

Ms. Elizabeth Kohl
Appliance and Equipment Standards Program
Energy Conservation Program for Consumer Products
U.S. Department of Energy
1000 Independence Avenue, SW.
Washington, DC 20585-0121

Docket Number: EERE-2018-BT-STD-0005-0001
RIN: Not Assigned

Dear Ms. Kohl:

This letter comprises the comments of the Pacific Gas and Electric Company, Southern California Gas Company, San Diego Gas and Electric, and Southern California Edison in response to the United States (U.S.) Department of Energy (DOE) request for comments regarding the petition for rulemaking from the Competitive Enterprise Institute ("CEI") requesting that DOE create a new product class for dishwashers capable of washing a full load of dishes in less than one hour.

Deleted: (PG&E)
Commented [BJL1]: Utility acronyms are not needed, except for maybe PG&E if you use "PG&E" in the description for the data in 5).
Deleted: (SoCalGas)
Deleted: (SDG&E)
Deleted: (SCE)
Deleted:
Deleted: United States

The signatories of this letter, collectively referred to herein as the California Investor Owned Utilities (CA IOUs), represent some of the largest utility companies in the Western U.S., serving over 35 million customers. As energy companies, we understand the potential of appliance efficiency standards to cut costs and reduce consumption while maintaining or increasing consumer utility of the products. We have a responsibility to our customers to advocate for standards that accurately reflect the climate and conditions of our respective service areas, so as to maximize these positive effects.

We appreciate this opportunity to provide the following comments in response to this petition asking for the DOE to initiate a rulemaking to create a new product class for residential dishwashers with a cycle time of less than an hour (from washing through drying). The California IOUs recommend that DOE reject the petition for the reasons highlighted below.

- 1) Consumer preference for quieter dishwashers and regulations to reduce phosphates in dishwasher detergents have been significant drivers of increased cycle times. The largest increase of average cycle times (35 minutes) came between 1995 and 2009 when there were no DOE efficiency standard updates.

There is insufficient evidence that dishwasher cycle times have become longer solely due to national energy efficiency standards. In fact, the most significant increase in dishwasher cycle time (35 minutes) occurred over a span of 14 years between 1995 and 2009 when there were no DOE efficiency standards updates as is shown in Figure 1. (DOE's 2nd and 3rd standards became effective in 1994 and 2010 respectively.) However, there were two other significant changes to the dishwasher market during this time which significantly impacted cycle times: consumer preference for quieter dishwashers and regulations on phosphate-based dishwashing detergents.

Dishwasher Average Cycle Times based upon Consumer Reports testing

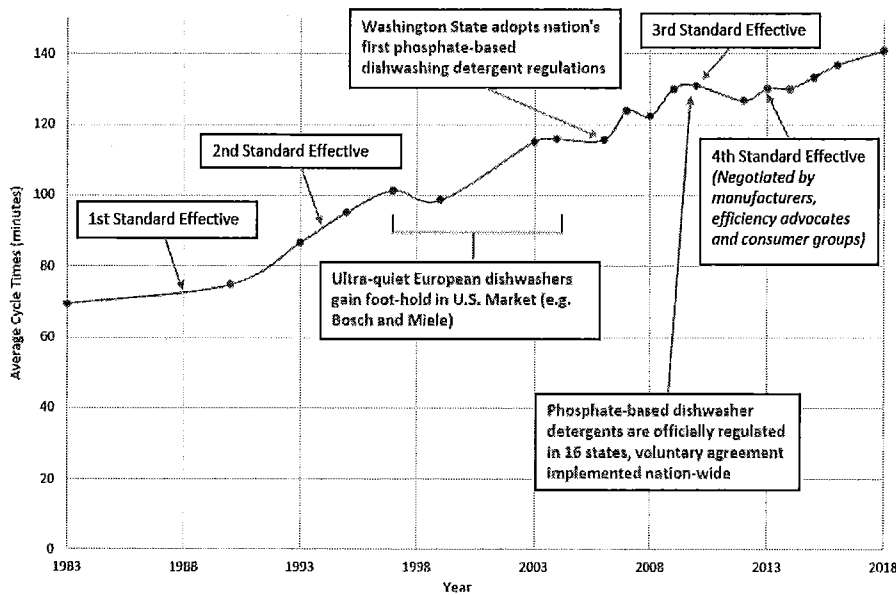


Figure 1: Dishwashing average cycle times, and key milestones in dishwashing industry.

Source: XXXXXX

Consumer preference for quieter dishwashers

In the early 2000s, European manufacturer, Bosch, began introducing quieter dishwashers, popular in Europe, to the U.S. market that was historically comprised of louder dishwashers that averaged 60 A-weighted decibels (dBA), which is close to the sound level of a vacuum cleaner. These quieter dishwashers have become increasingly popular with consumers, which has resulted in the availability of dishwashers with sound ratings averaging between 40-50 dBA, with some models performing as low as 37 dBA (similar to the noise level of a fan).¹

However, one of the main ways dishwasher manufacturers achieve a lower dBA rating is by increasing cycle times. Because “dishwasher manufacturers measure sound levels in averages . . . they can lower their overall dBA scores by limiting the duration of certain loud or high-decibel activities. This makes for a quieter dBA rating, but it may increase wash times.”² (emphasis added) According to compactappliance.com, a low sound rating is among the most-requested features consumers seek in a dishwasher. A dishwasher consumer report on reviewed.com cites that “according to Bosch, it’s [sound

¹ Decibel A-weighting, or dBA is the industry’s method of rating sound from dishwashers the emphasizes what noise frequencies the human ear will be sensitive to. For more information see: <https://learn.compactappliance.com/dishwasher-decibel-ratings/>

² <http://dishwashers.reviewed.com/features/is-your-dishwasher-quiet-enough>

Commented [BJL2]:
Recommend for Figure text, the following:

1) Add a comma after “e.g.” to read “(e.g., Bosch and Miele)”.

Ultra-quiet European dishwashers gain foot-hold in U.S. Market (e.g., Bosch and Miele)

2) No capitalization of Negotiation, and add a comma after “advocates” to read “(negotiated by manufacturers, efficiency advocates, and consumer groups)”.

4th Standard Effective (Negotiated by manufacturers, efficiency advocates and consumer groups)

3) Capitalize only certain words in the Figure caption to read:

“Dishwasher average cycle times based upon Consumer Reports testing”

No caps for “Average Cycle Times” since it is not capitalized in the text of the document itself

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Draft Comment Letter – Do Not Distribute

rating] the second biggest driver for purchase—only after price.” Dishwasher manufacturers have responded to consumer preference for quieter machines, and cycle times have increased as a result.

State regulations and national voluntary agreement on dishwashing detergent formulas

In 2006, the state of Washington became the first state in the country to pass regulations limiting phosphates in dishwashing detergent due to water quality concerns.³ Excessive phosphates in wastewater leads to many environmental problems, including algae blooms in rivers and lakes. While Washington was the first state in the country to regulate dishwashing detergents, by 2010 a total of sixteen states had implemented dishwasher detergent regulations to address phosphate content. This patchwork of state standards ultimately led to a national voluntary agreement where dishwashing detergent manufacturers agreed to limit phosphates in dishwashing detergent nationwide.⁴ These regulations resulted in replacing phosphate-based dishwashing detergents with enzyme-based detergents. While phosphate-based dishwasher detergents were very effective at removing food from dishes quickly, they had many environmental impacts. On the other hand, enzyme-based detergents are less harmful to the environment, but take longer to break down food particles. Understanding this chemistry, dishwasher manufacturers have extended their cycle time to accommodate the new detergent formulas.⁵

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Based on the earliest data in the CEI petition’s supporting document files from Consumer Reports, the average cycle time in 1983, prior to any federal efficiency standards, was 69 minutes (as is shown in Figure 1). CEI is petitioning DOE to create a new products class for dishwashers that can perform a cycle in 60 minutes or less. Based on CEI’s own submitted data, it is not clear that the dishwashers on average have ever technically been able to clean dishes in less than one hour. When considering strong consumer preference for quieter dishwashers and existing phosphate-based dishwashing detergent regulations, this 60-minute cycle-time is likely out of reach if not impossible. The CA IOUs understand there are many considerations dishwasher manufacturers take into account when designing dishwashers, and encourage DOE to reject this petition that attempts to override these other strong consumer preferences and regulatory constraints.

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2) The petition to create a new product class with a likely weaker standard would violate the anti-backsliding provision.

CEI’s petition should not be granted as it would most likely lead to the violation of the anti-back sliding provision in Section 325(o)(1) of the Energy Policy and Conservation Act (“EPCA”), which states that the DOE cannot adopt a standard that reduces the stringency of energy efficiency requirements for a product class. Section 325(o)(1) of EPCA prohibits DOE from prescribing “any amended standard which increases the maximum allowable energy use... or decreases the minimum required energy efficiency, of a covered product.” A new product category for dishwashers with a lower energy efficiency standard than the existing standards for residential dishwashers, as this petition recommends, would violate EPCA. Given this, DOE would not be able to consider a new product class with a less stringent level. The only way this new product class would not violate EPCA is if any new standard was at least as stringent, or more stringent, than the current standard.

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Commented [BJL3]: Does the petition actually recommend a lower efficiency standard, or will the petition, if adopted, most likely result in a lower efficiency standard? We probably need to reword this thought.

³ <http://content.time.com/time/magazine/article/0,9171,2030878,00.html>

⁴ <http://www.marketwired.com/press-release/detergent-industrys-landmark-voluntary-phosphate-ban-caps-seventh-generations-decade-1283540.htm>

⁵ <http://dishwashers.reviewed.com/features/why-is-my-dishwasher-so-slow>

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Draft Comment Letter – Do Not Distribute

- 3) The petition sets a dangerous precedent to define a product class based on customer preferences, such as cycle time, which has never been used to define a product class for any product.

The CA IOUs do not believe cycle time is a substantial consumer utility to establish a new product class, as asserted in the CEI petition. As discussed earlier, cycle time has increased due to consumer preference for quieter dishwashers, as well as phosphate regulations on dishwashing detergents. The petition states that federal energy efficiency standards have been the primary driver of longer cycle times, but there is insufficient evidence to prove that statement, especially given the aforementioned research on consumers changing preferences and dishwashing detergent regulations.

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Additionally, if the DOE were to accept a new product based on a customer preference, this would establish a precedent of allowing subjective product characteristics to define product classes resulting in arbitrary customer preferences being used to define separate product categories, such as noise level, cleanability, WiFi connection, and water efficiency in the case of residential dishwashers. This could result in a plethora of requests for other product categories to be define by other arbitrary customer preferences.

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- 4) There are numerous products currently on the market with multiple consumer selected cycles, including the option to run shorter cycles, or “express cycles”, so it is unclear why a separate product class is needed.

While the average cycle times for dishwashers in 2018 was 2 hours and 20 minutes, this only represents an average, and does not represent all products available to customers with multiple cycle time choices.⁶ For example, the GE Café™ Series Stainless Interior Built-In Dishwasher with Hidden Controls offers seven cycle options, and three out of seven have a cycle time of less than 60 minutes (Light 55 mins, Rinse 16 mins, Express 32 Mins).⁷ Additionally, Frigidaire Gallery 24" Built-In Dishwasher with EvenDry™ System offers eight cycle options, one of which is a Quick Wash that runs 30 mins.⁸ If cycle time is an important factor for customers when purchasing a dishwasher, the products currently available on the market provide enough choices for those looking for short cycle times.

Additionally, the petition’s supplemental letter stated that these express cycles are not meant for normally soiled loads, and do not provide customers with an appropriate degree of customer choice. However, it is unclear how an additional dishwasher product class for dishwashers with a cycle time of less than 60 minutes would provide even more choices for customers than what is already available.

- 5) The average cycles/year and load shape information for dishwashers implies that consumers do not perform more than one cycle per day, so cycle time should be less of a concern.

[Data and explanatory text from field surveys from PG&E.]

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⁶ <https://www.regulations.gov/document?D=EERE-2018-BT-STD-0005-0006>

⁷ <http://products.geappliances.com/MarketingObjectRetrieval/Dispatcher?RequestType=PDF&Name=49-55119-1.PDF>

⁸ http://manuals.frigidaire.com/prodinfo_pdf/Specsheets/FGID2476S_0317_CN.pdf

Draft Comment Letter – Do Not Distribute

In conclusion, we would like to reiterate our support to DOE for rejecting the petition for residential dishwashers. We thank DOE for the opportunity to be involved in this process and encourage DOE to carefully consider the recommendations outlined in this letter.

Sincerely,

Patrick Eilert
Manager, Codes & Standards
Pacific Gas and Electric Company

Darren Hanway
Energy Efficiency Program Operations Manager
Southern California Gas Company

Michelle Thomas
Manager, Energy Codes & Standards and ZNE
Engineering Services
Southern California Edison

Kate Zeng
ETP/C&S/ZNE Manager
Customer Programs
San Diego Gas & Electric Company

Summary of Residential Dishwashers-Petition for Rulemaking- Comment Letter to DOE

Topic: Residential Dishwashers- Petition											
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Rulemaking Milestone</th> <th style="text-align: left;">Date</th> </tr> </thead> <tbody> <tr> <td>Petition</td> <td>3/2018</td> </tr> <tr> <td>NOPR</td> <td></td> </tr> <tr> <td>Final Rule</td> <td></td> </tr> <tr> <td>Potential Effective Date</td> <td></td> </tr> </tbody> </table>	Rulemaking Milestone	Date	Petition	3/2018	NOPR		Final Rule		Potential Effective Date		
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Petition	3/2018										
NOPR											
Final Rule											
Potential Effective Date											
* <i>Italics indicate anticipated dates.</i>											
<p>Comment Letter June 22, 2018</p> <p>Approval Deadline</p>											
<p>Rulemaking Summary</p> <p>A petition was submitted by the Competitive Enterprise Institute (CEI) to DOE to initiate a rulemaking to create a new product class for residential dishwashers with a cycle time of less than an hour (from washing through drying). According to Consumer Reports, the average cycle time of currently available residential dishwashers is 2 hours and 20 minutes. CEI cites the increasing run times of dishwashers as well as customer dissatisfaction with these increased runtimes from GE Appliances, Consumer Affairs, Consumer Reports, and the AHAM. The petition claims residential dishwashers with a shorter time cycle offer a ‘performance-related feature’ and ‘additional customer choice’ that provides substantial consumer utility, which justifies a different (higher or lower) standard than other residential dishwashers.</p>											
<p>Portfolio Impacts</p> <p>There are no California IOUs with residential dishwasher rebate programs.</p>											
<p>Impact on Voluntary Programs:</p> <p>2016 Programs <input type="checkbox"/></p> <p>Future Programs <input type="checkbox"/></p> <p>No Impact <input checked="" type="checkbox"/></p>											
<p>Estimated First-Year Savings</p> <p>Likely a loss of savings from creation of new product class.</p>											
<p>Involvement by Product Development</p> <p>TBD</p>											
<p>Advocate Comment Letters</p> <p>ASAP, NRDC, NEEA, ASE, Earth Justice and ACEEE are likely to develop comment letters that likely aligns with many of the recommendations noted here.</p>											
<p>Stakeholder Allies</p> <ol style="list-style-type: none"> 1. Perhaps some manufacturers 2. Efficiency advocates 											
<p>Industry Opponents</p> <ol style="list-style-type: none"> 3. Competitive Enterprise Institute 4. Perhaps some manufacturers 5. AHAM (unknown, but likely) 											
<p>Summary IOU Recommendations to DOE</p> <p>The CA IOUs recommend DOE reject the petition for the following reasons:</p> <ol style="list-style-type: none"> 1. The petition to create a new product class with a likely weaker standard violates the anti-backsliding provision. 2. The petition sets a dangerous precedent to define a product class based on customer preferences, such as cycle time, which has never been used to define a product class for any product. 3. There are at numerous products on the market with multiple consumer selected cycles, including the option to run shorter cycles, so it is unclear why a separate product class is needed. 4. There is evidence that not all efficiency gains come at the expense of cycle time. The largest increase of cycle times (35 minutes) came between 1995 and 2009 when there were no DOE standard updates. 5. The average cycles/year and load shape information for dishwashers implies that consumers don’t perform more than one cycle per day, so cycle time should be less of a concern. 6. The petition has not provided sufficient data to show that one-hour cycle times are even technically feasible as even before standards, average cycle times were greater than 70 minutes in 1983 according to consumer reports. 											

View the Comment Letter Tracker for the list of upcoming comment letter deadlines:
<http://confluence.energy-solution.net/x/cQDY>

Mendoza, Ray J

From: Mendoza, Ray J
Sent: Monday, June 25, 2018 3:02 PM
To: 'Leslie Nelson'; Bijit Kundu; Nate Dewart
Cc: Manke, Adam P
Subject: RE: APPROVAL REQUEST: June 25: Cooking Top Test Procedure Comment Letter

Good afternoon all,

At this time SoCalGas will not be taking a position on this measure. Can you please remove SoCalGas from this comment letter.

Thank you,

Ray Mendoza

Programs Advisor
Southern California Gas Co.
Energy Resource Center / M.L. SCERC1
Phone: 562-803-7493

 Please consider the environment before printing this e-mail.

From: Mendoza, Ray J
Sent: Friday, June 22, 2018 11:01 AM
To: 'Leslie Nelson' <lnelson@energy-solution.com>
Subject: RE: APPROVAL REQUEST: June 25: Cooking Top Test Procedure Comment Letter

Hi Leslie,

SoCalGas approves.

Ray Mendoza

Programs Advisor
Southern California Gas Co.
Energy Resource Center / M.L. SCERC1
Phone: 562-803-7493

 Please consider the environment before printing this e-mail.

From: Leslie Nelson [<mailto:lnelson@energy-solution.com>]
Sent: Tuesday, June 19, 2018 4:36 PM
To: Anderson, Mary <M3AK@pge.com>; charles.kim@sce.com; randall.higa@sce.com; Barbour, John L <JBarbour@semprautilities.com>; Mendoza, Ray J <RJMendo1@semprautilities.com>; Reefe, Jeremy <JMReefe@semprautilities.com>
Cc: ple2@pge.com; Michelle.Thomas@sce.com; Zeng, Kate <KZeng@semprautilities.com>; Manke, Adam P <AManke@semprautilities.com>; Bijit Kundu <BKundu@energy-solution.com>
Subject: [EXTERNAL] APPROVAL REQUEST: June 25: Cooking Top Test Procedure Comment Letter

All,

Please see attached a draft comment letter in response to the Association of Home Appliance Manufacturers (AHAM) petition for rulemaking requesting that DOE withdraw, and immediately stay the effectiveness of, the conventional cooking top test procedure. This comment letter reflects the comments outlined in the review form, which is also attached for your reference.

The approval deadline is **12:00 PM on Monday June 25th**. We are requesting that all feedback is provided by **Friday June 22nd** so we can distribute a final letter for approval. Please let me know if you think your organization will have trouble meeting this deadline.

Thanks!

Leslie Nelson | Associate | lnelson@energy-solution.com | (510) 482-4420 x251 | [449 15th Street, Oakland CA 94612](#)



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

Mendoza, Ray J

From: Ed Pike <epike@energy-solution.com>
Sent: Monday, June 25, 2018 11:51 AM
To: Mendoza, Ray J
Cc: Manke, Adam P
Subject: [EXTERNAL] RE: Due TODAY 3 pm! review of EVSE ENERGY STAR comment letter

Ray-

Thank you for letting me know. Yes, I will remove SoCalGas from the letter.

Best,
Ed

Ed Pike, PE, on Behalf of the Statewide Utility Codes and Standards Team | Senior Engineer | epike@energy-solution.com | (510) 482-4420 x239 | [449 15th Street, Oakland CA 94612](http://449%2015%20Street%2C%20Oakland%20CA%2094612)



From: Mendoza, Ray J [<mailto:RJMendo1@semprautilities.com>]
Sent: Monday, June 25, 2018 11:50 AM
To: Ed Pike <epike@energy-solution.com>
Cc: Manke, Adam P <AManke@semprautilities.com>
Subject: RE: Due TODAY 3 pm! review of EVSE ENERGY STAR comment letter

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Southern California Gas Co.
Energy Resource Center / M.L. SCERC1
Phone: 562-803-7493

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From: Ed Pike [<mailto:epike@energy-solution.com>]
Sent: Monday, June 25, 2018 11:03 AM
To: M3AK@pge.com; bach.tsan@sce.com; charles.kim@sce.com; randall.higa@sce.com; Mendoza, Ray J <RJMendo1@semprautilities.com>; jordan.smith@sce.com
Cc: ple2@pge.com; Michelle.Thomas@sce.com; Manke, Adam P <AManke@semprautilities.com>; Bijit Kundu <BKundu@energy-solution.com>
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Hi All,

I've received final approval from SDG&E on this comment letter and still awaiting final approvals from PG&E, SCE, and SoCalGas. Approvals are due TODAY at 3 pm so that we can docket the letter by end of day TODAY.

Please let me know today if you have any feedback on this letter.

Thanks!

Best,
Ed

Ed Pike, P. E., Senior Engineer | (510) 482-4420 x239

From: Ed Pike
Sent: Friday, June 22, 2018 11:23 AM
To: 'M3AK@pge.com' <M3AK@pge.com>; bach.tsan@sce.com; 'charles.kim@sce.com' <charles.kim@sce.com>; 'randall.higa@sce.com' <randall.higa@sce.com>; 'JBarbour@semprautilities.com' <JBarbour@semprautilities.com>; 'LWillmore@semprautilities.com' <LWillmore@semprautilities.com>; 'RJMendo1@semprautilities.com' <RJMendo1@semprautilities.com>; jordan.smith@sce.com
Cc: ple2@pge.com; 'L4B3@pge.com' <L4B3@pge.com>; 'Michelle.Thomas@sce.com' <Michelle.Thomas@sce.com>; 'KZeng@semprautilities.com' <KZeng@semprautilities.com>; 'JMReefe@semprautilities.com' <JMReefe@semprautilities.com>; 'SKristjansson@semprautilities.com' <SKristjansson@semprautilities.com>; 'cgoff@semprautilities.com' <cgoff@semprautilities.com>; 'AManke@semprautilities.com' <AManke@semprautilities.com>; Bijit Kundu <bkundu@energy-solution.com>
Subject: Draft comment letter on ENERGY STAR EVSE v1.1 development – reviews due TODAY June 22nd - minor revisions attached

Hi all-

Attached is the latest draft comment letter v1a with some wording improvements including clarifications requested by SDG&E. The only change of substance is the addition of three bullets under question 12, which I added as a result of informal sidebar discussions with EVSE manufacturers at a conference this week.

If you have already started marking up the version v1 sent June 15th, providing comments based on v1 is fine.

Thanks SDG&E for finishing your review ahead of schedule!

Please let me know if you need a marked-up version of v 1a or have any questions.

Best,
Ed

Ed Pike, P. E., Senior Engineer | (510) 482-4420 x239

From: Ed Pike
Sent: Friday, June 15, 2018 5:58 PM
To: M3AK@pge.com; bach.tsan@sce.com; charles.kim@sce.com; randall.higa@sce.com; JBarbour@semprautilities.com; LWillmore@semprautilities.com; RJMendo1@semprautilities.com; jordan.smith@sce.com
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Thanks to SCE for providing input for the draft letter in response to my May 30th message, and I of course I welcome additional IOU feedback.

Please let me know if you would like to have an IOU call before this letter goes out, and/or if you have any questions. FYI, I will be on vacation Monday and in Portland for EV Roadmap 11 Tuesday and Wednesday and will be checking messages Monday evening and periodically during the day Tuesday/Wednesday.

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Mendoza, Ray J

From: Michelle Thomas <Michelle.Thomas@sce.com>
Sent: Monday, June 25, 2018 1:42 PM
To: Ed Pike; M3AK@pge.com; Bach Tsan; Charles Kim; Randall Higa; Mendoza, Ray J; Jordan Smith
Cc: ple2@pge.com; Manke, Adam P; Bijit Kundu
Subject: [EXTERNAL] RE: (External):Due TODAY 3 pm! review of EVSE ENERGY STAR comment letter

SCE approves.

From: Ed Pike [mailto:epike@energy-solution.com]
Sent: Monday, June 25, 2018 11:03 AM
To: M3AK@pge.com; Bach Tsan <Bach.Tsan@sce.com>; Charles Kim <Charles.Kim@sce.com>; Randall Higa <Randall.Higa@sce.com>; RJMendo1@semprautilities.com; Jordan Smith <Jordan.Smith@sce.com>
Cc: ple2@pge.com; Michelle Thomas <Michelle.Thomas@sce.com>; AManke@semprautilities.com; Bijit Kundu <BKundu@energy-solution.com>
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Ed Pike, P. E., Senior Engineer | (510) 482-4420 x239

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To: 'M3AK@pge.com' <M3AK@pge.com>; 'bach.tsan@sce.com' <bach.tsan@sce.com>; 'charles.kim@sce.com' <charles.kim@sce.com>; 'randall.higa@sce.com' <randall.higa@sce.com>; 'JBarbour@semprautilities.com' <JBarbour@semprautilities.com>; 'LWillmore@semprautilities.com' <LWillmore@semprautilities.com>; 'RJMendo1@semprautilities.com' <RJMendo1@semprautilities.com>; 'jordan.smith@sce.com' <jordan.smith@sce.com>
Cc: 'ple2@pge.com' <ple2@pge.com>; 'L4B3@pge.com' <L4B3@pge.com>; 'Michelle.Thomas@sce.com' <Michelle.Thomas@sce.com>; 'KZeng@semprautilities.com' <KZeng@semprautilities.com>; 'JMReefe@semprautilities.com' <JMReefe@semprautilities.com>; 'SKristjansson@semprautilities.com' <SKristjansson@semprautilities.com>; 'cgoff@semprautilities.com' <cgoff@semprautilities.com>; 'AManke@semprautilities.com' <AManke@semprautilities.com>; Bijit Kundu <bkundu@energy-solution.com>
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Ed Pike, PE, on Behalf of the Statewide Utility Codes and Standards Team | Senior Engineer | epike@energy-solution.com | (510) 482-4420 x239 | [449 15th Street, Oakland CA 94612](https://www.energy-solutions.com)



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Cc: ple2@pge.com; Michelle.Thomas@sce.com; Manke, Adam P; Bijit Kundu
Subject: [EXTERNAL] Due TODAY 3 pm! review of EVSE ENERGY STAR comment letter
Attachments: ENERGY STAR EVSE Version 1.1 Discussion Guide Cover Memo.pdf; ENERGY STAR EVSE Version 1.1 Discussion Guide Webinar.pdf; ENERGY STAR EVSE Version 1.1 Specification and Test Method Discussion Guide.pdf; One Page Review Form DC Output EVSE.pdf; CA IOU EVSE Energy Star v1.1 Discussion Guide comment letter for IOU review 1a.docx

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Ed Pike, P. E., Senior Engineer | (510) 482-4420 x239

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Cc: ple2@pge.com; 'L4B3@pge.com' <L4B3@pge.com>; 'Michelle.Thomas@sce.com' <Michelle.Thomas@sce.com>; 'KZeng@semprautilities.com' <KZeng@semprautilities.com>; 'JMReefe@semprautilities.com' <JMReefe@semprautilities.com>; 'SKristjansson@semprautilities.com' <SKristjansson@semprautilities.com>; 'cgoff@semprautilities.com' <cgoff@semprautilities.com>; 'AManke@semprautilities.com' <AManke@semprautilities.com>; Bijit Kundu <bkundu@energy-solution.com>
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Ed Pike, P. E., Senior Engineer | (510) 482-4420 x239

From: Ed Pike
Sent: Friday, June 15, 2018 5:58 PM
To: M3AK@pge.com; bach.tsan@sce.com; charles.kim@sce.com; randall.higa@sce.com; JBarbour@semprautilities.com; LWillmore@semprautilities.com; RJMendo1@semprautilities.com; jordan.smith@sce.com
Cc: ple2@pge.com; L4B3@pge.com; Michelle.Thomas@sce.com; KZeng@semprautilities.com; JMReefe@semprautilities.com; SKristjansson@semprautilities.com; cgoff@semprautilities.com; AManke@semprautilities.com; Bijit Kundu (bkundu@energy-solution.com)

[solution.com](mailto:bkundu@energy-solution.com)) <bkundu@energy-solution.com>

Subject: Draft comment letter on ENERGY STAR EVSE v1.1 development – reviews due June 22nd

Hi all-

Attached is the draft CA IOU comment letter response to U.S. EPA's request for stakeholder input regarding 19 questions in the ENERGY STAR® EVSE Draft v1.1 Specification and Test Method Discussion Guide Questions. **Reviews are due COB Friday June 22nd.** I have also attached the CA IOU One Page summary form sent earlier; US EPA's Discussion Guide, US EPA's cover letter and US EPA's webinar notes.

Thanks to SCE for providing input for the draft letter in response to my May 30th message, and I of course I welcome additional IOU feedback.

Please let me know if you would like to have an IOU call before this letter goes out, and/or if you have any questions. FYI, I will be on vacation Monday and in Portland for EV Roadmap 11 Tuesday and Wednesday and will be checking messages Monday evening and periodically during the day Tuesday/Wednesday.

Thank you!

Best,
Ed

Ed Pike, PE, on Behalf of the Statewide Utility Codes and Standards Team | Senior Engineer | epike@energy-solution.com | (510) 482-4420 x239 | [449 15th Street, Oakland CA 94612](https://www.energy-solution.com)



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

Mendoza, Ray J

From: Ed Pike <epike@energy-solution.com>
Sent: Friday, June 22, 2018 11:23 AM
To: M3AK@pge.com; bach.tsan@sce.com; charles.kim@sce.com; randall.higa@sce.com; Barbour, John L; Willmore, Lovell; Mendoza, Ray J; jordan.smith@sce.com
Cc: ple2@pge.com; L4B3@pge.com; Michelle.Thomas@sce.com; Zeng, Kate; Reefe, Jeremy; TERM-10-04-17 Kristjansson, Sue; Goff, Chris (Industrial Mkts); Manke, Adam P; Bijit Kundu
Subject: [EXTERNAL] Draft comment letter on ENERGY STAR EVSE v1.1 development – reviews due TODAY June 22nd - minor revisions attached
Attachments: ENERGY STAR EVSE Version 1.1 Discussion Guide Cover Memo.pdf; ENERGY STAR EVSE Version 1.1 Discussion Guide Webinar.pdf; ENERGY STAR EVSE Version 1.1 Specification and Test Method Discussion Guide.pdf; One Page Review Form DC Output EVSE.pdf; CA IOU EVSE Energy Star v1.1 Discussion Guide comment letter for IOU review 1a.docx

Hi all-

Attached is the latest draft comment letter v1a with some wording improvements including clarifications requested by SDG&E. The only change of substance is the addition of three bullets under question 12, which I added as a result of informal sidebar discussions with EVSE manufacturers at a conference this week.

If you have already started marking up the version v1 sent June 15th, providing comments based on v1 is fine.

Thanks SDG&E for finishing your review ahead of schedule!

Please let me know if you need a marked-up version of v 1a or have any questions.

Best,
Ed

Ed Pike, P. E., Senior Engineer | (510) 482-4420 x239

From: Ed Pike
Sent: Friday, June 15, 2018 5:58 PM
To: M3AK@pge.com; bach.tsan@sce.com; charles.kim@sce.com; randall.higa@sce.com; JBarbour@semprautilities.com; LWillmore@semprautilities.com; RJMendo1@semprautilities.com; jordan.smith@sce.com
Cc: ple2@pge.com; L4B3@pge.com; Michelle.Thomas@sce.com; KZeng@semprautilities.com; JMReefe@semprautilities.com; SKristjansson@semprautilities.com; cgoff@semprautilities.com; AManke@semprautilities.com; Bijit Kundu (bkundu@energy-solution.com) <bkundu@energy-solution.com>
Subject: Draft comment letter on ENERGY STAR EVSE v1.1 development – reviews due June 22nd

Hi all-

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Thank you!

Best,
Ed

Ed Pike, PE, on Behalf of the Statewide Utility Codes and Standards Team | Senior Engineer | epike@energy-solution.com | (510) 482-4420 x239 | [449 15th Street, Oakland CA 94612](http://449-15th-Street.Oakland.CA.94612)



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

Mendoza, Ray J

From: Ed Pike <epike@energy-solution.com>
Sent: Friday, June 15, 2018 5:58 PM
To: M3AK@pge.com; bach.tsan@sce.com; charles.kim@sce.com; randall.higa@sce.com; Barbour, John L; Willmore, Lovell; Mendoza, Ray J; jordan.smith@sce.com
Cc: ple2@pge.com; L4B3@pge.com; Michelle.Thomas@sce.com; Zeng, Kate; Reefe, Jeremy; TERM-10-04-17 Kristjansson, Sue; Goff, Chris (Industrial Mkts); Manke, Adam P; Bijit Kundu
Subject: [EXTERNAL] Draft comment letter on ENERGY STAR EVSE v1.1 development – reviews due June 22nd
Attachments: CA IOU EVSE Energy Star v1.1 Discussion Guide comment letter for IOU review.docx; ENERGY STAR EVSE Version 1.1 Discussion Guide Cover Memo.pdf; ENERGY STAR EVSE Version 1.1 Discussion Guide Webinar.pdf; ENERGY STAR EVSE Version 1.1 Specification and Test Method Discussion Guide.pdf; One Page Review Form DC Output EVSE.pdf

Hi all-

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Best,
Ed

Ed Pike, PE, on Behalf of the Statewide Utility Codes and Standards Team | Senior Engineer | epike@energy-solution.com | (510) 482-4420 x239 | [449 15th Street, Oakland CA 94612](http://449-15th-street.com)



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ATTACHMENT D

Mendoza, Ray J

Subject: [EXTERNAL] DOE Dishwasher Collaboration with the CEC
Location: Conference Call

Start: Mon 6/4/2018 9:00 AM
End: Mon 6/4/2018 10:00 AM

Recurrence: (none)

Meeting Status: Accepted

Organizer: Anderson, Mary

Mary Anderson invites you to an online meeting using WebEx.

Meeting Number: 744 389 814

Meeting Password: This meeting does not require a password.

To join this meeting

1. Go to <https://pge.webex.com/pge/j.php?MTID=m722128848fce1a7efc61277f4c34955d>
2. If requested, enter your name and email address.
3. If a password is required, enter the meeting password: This meeting does not require a password.
4. Click "Join".
5. Follow the instructions that appear on your screen.

Audio conference information

To receive a call back, provide your phone number when you join the meeting, or call the number below and enter the access code.

US Toll Free: +1 800 603 7556

Having trouble dialing in? Try these backup numbers:

US Toll Free: +1 800 603 7556

US Toll: +1 270 240 0886

Access code:744 389 814

Global call-in numbers: <https://pge.webex.com/pge/globalcallin.php?serviceType=MC&ED=695857892&tollFree=1>

Toll-free dialing restrictions: https://www.webex.com/pdf/tollfree_restrictions.pdf

***ONLY for Conference Room access ***

JOIN FROM A VIDEO CONFERENCING SYSTEM OR APPLICATION

Dial <sip:744389814@pge.webex.com>

<https://www.webex.com>

IMPORTANT NOTICE: This WebEx service includes a feature that allows audio and any documents and other materials exchanged or viewed during the session to be recorded. By joining this session, you automatically consent to such recordings. If you do not consent to the recording, discuss your concerns with the meeting host prior to the start of the recording or do not join the session. Please note that any such recordings may be subject to discovery in the event of litigation.

We respect your privacy. Please review our privacy policy for more information.
<http://www.pge.com/en/about/company/privacy/customer/index.page>

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

Mendoza, Ray J

Subject: [EXTERNAL] Call for Comment Letter on Res Dishwasher Petition
Location: Conference Call

Start: Thu 6/7/2018 3:00 PM
End: Thu 6/7/2018 4:00 PM

Recurrence: (none)

Meeting Status: Accepted

Organizer: Alanna Torres

Agenda: review the one-page review form and potential comments due to the DOE on Monday June 25th and Mary to provide an update on dishwasher meter and survey data

To Join the Audio Portion - -

At the scheduled date and time please call:

Please call 510-858-5509

When prompted, enter the following Conference ID: 28122899, followed by # key.

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

2019 Title 24 Advocacy Support ASHRAE 90.1 Presentation– Meeting Notes

Meeting Information

Meeting Date: June 11, 2018

Meeting Time: 11:00AM – 12:00PM

Meeting Info: Call in: (415)-594-5500 Conference ID: 940-290-811#

Invitees

Attended	Attendee	Company	Email
X	Bach Tsan	SCE	Bach.Tsan@sce.com
X	Randall Higa	SCE	RHiga@sce.com
X	Kelly Cunningham	PG&E	KACV@pge.com
X	Mark Alatorre	PG&E	M6AC@pge.com
X	John Barbour	SDG&E	JBarbour@semprautilities.com
	Jeremy Reefer	SDG&E	JMReefe@semprautilities.com
X	Ray Mendoza	SoCalGas	RMendo1@semprautilities.com
X	Heidi Hauenstein	Energy Solutions	HHauenstein@energy-solution.com
X	Rahul Athalye	Energy Solutions	RAthalye@energy-solution.com
X	Leslie Nelson	Energy Solutions	LNelson@energy-solution.com

Notes

1. Rahul delivered presentation: See presentation posted on Box here:
<https://codes.app.box.com/file/298099838059>
2. Kelly asked who determined that establishing the fixed baseline was the “way to go”
 - a. Rahul: It was the thought leaders including Charles Eley, Mike Rosenberg, and others.
 - b. Randall: in 2009, we did a CASE study on the [zEPI scale](#). When Mike Rosenberg was working on the ASHRAE 90.1 fixed baseline, he consulted Charles Ely and the work done on the zEPI Scale.
3. Bach: How is the baseline determined?
 - a. Rahul: We use the industry standard practice (ISP), but the baseline typically does not change a lot.
 - b. Randall: ISP industry standard practice is a non-code term. It is not a good term to use for discussions around code compliance. May be better to call it “standard design” for Title 24.
 - i. Rahul: I meant what the most common practice is – what is the system that is used the most?
 - ii. Randall: But in Title 24, the “standard practice” is very clearly defined. The “standard design” used in T24 to establish the baseline may not be the most

commonly-used system. The “standard design” could be more stringent than what is most commonly used. It can also be less efficient than the most common system.

4. Randall: Makes more sense to move Title 24 into a fixed baseline, but use ASHRAE 90.1-2004 as a baseline so the two baselines are aligned. Not sure what CEC is thinking. Using this approach could also help CEC when they do their comparison between the latest version of T24 and the latest version of ASHRAE 90.1. Does anybody know what CEC is thinking?
 - a. Kelly: we discussed this a bit during last year’s software symposium.
 - b. Bach: I don’t know if CEC is doing any internal research on establishing a fixed baseline. SCE did commit to completing some research, which included Rahul’s presentation today and a whitepaper from NORESO. Martha (CEC) has been openly interested in this since last year’s IBPSA conference.
5. Randall: Establishing a fixed baseline can be helpful for incentive programs.
6. Randall: If ISP “what is actually happening” is exactly the same as the “standard design”, all is good because incentive programs can get credit for going beyond ISP. If the T24 Standard Design is more stringent than ISP, it can be more problematic because people don’t get credit for going beyond ISP. There may be some work in identifying discrepancies between ISP and Standard Design and fixing those discrepancies whenever possible.
7. Heidi: what will the process look like to establish a fixed baseline based on 90.1?
 - a. Randall: We seem to be proposing to replicate what we did to establish the residential Energy Design Rating, which is based on IECC 2006, for nonresidential. What happened to establish the IECC 2006 baseline. It mostly happened within the Energy Commission and there was very little formal reporting, etc. It seems like it was mostly CEC presenting on the concept and CEC and their consultants doing the work behind the scenes.
 - b. Mark: CEC did present on the EDR during public meetings, but establishing baselines does not fall within the more stringent rules of updating the standards. That is, it doesn’t require a full rulemaking.
 - c. Randall: Establishing fixed baselines for 90.1 was a big deal. It went through three rounds of public review, the committee received lots of public comments, and some people are still unhappy with the outcomes. Do we expect a similar response in California?
 - i. Rahul: no. I don’t think establishing a fixed baseline in California will be controversial. A majority of the debate at 90.1 was that we were establishing a new compliance pathway that didn’t exist previously. We needed to make sure that the new pathway wasn’t too strict or too lenient. Since establishing the baseline in California will not require establishing a new compliance pathway, I don’t think this will be a big to-do.
 - ii. Randall: Seems like most of the debate happens when modify the stringency of the standards, which will happen through rulemakings when we revised the mandatory and prescriptive requirements. Most of the work to establish the fixed baseline will occur through the ACM process. If we were going to base the code compliance on the ERD ratings, that would be a different situation, but I don’t think we are intending to do so.
 - d. Rahul: One part of this is establishing a fixed baseline, but I think we may also make revisions to the rulesets.
 - i. Randall: modifying rulesets is a more political issue.

- e. Kelly: to get a better idea of the history of how the residential baseline was established, I think we should speak with Larry from CEC. Larry can bring Martha in as appropriate.
 - i. **ACTION: Bach and/or Kelly speak with Larry to better understand the history of establishing the residential EDR based on the 2006 IECC and the process CEC used to establish the baselines.**
- 8. Heidi: There is also the question of what would need to happen from the technical perspective to establish the baseline values. What modeling work would need to happen to establish the baselines?
 - a. Bach: I have been working with NORESKO and PNNL on this question.
 - b. **ACTION: Bach and Rahul connect about the work NORESKO and PNNL have been doing to start thinking about the technical work required to establish NR baselines based on ASHRAE 90.1**
- 9. **Review Action Items from Today's Call**
 - a. **ACTION: Bach and/or Kelly speak with Larry to better understand the history of establishing the residential EDR based on the 2006 IECC and the process CEC used to establish the baselines.**
 - b. **ACTION: Bach and Rahul connect about the work NORESKO and PNNL have been doing to start thinking about the technical work required to establish NR baselines based on ASHRAE 90.1**

Mendoza, Ray J

From: Rahul Athalye <rathalye@energy-solution.com>
Sent: Monday, June 11, 2018 11:03 AM
To: Leslie Nelson; bach.tsan@sce.com; Cunningham, Kelly; Heidi Hauenstein; Barbour, John L; Reefe, Jeremy; Mendoza, Ray J; Christopher Kuch; ple2@pge.com; M6AC@pge.com; Michelle.Thomas@sce.com
Cc: charles.kim@sce.com; randall.higa@sce.com; Wiliam.vicent@sce.com
Subject: [EXTERNAL] RE: ASHRAE 90.1 Presentation
Attachments: AppendixG_90.1-2016_Software_Advocacy_11Jun2018b.pptx

All, please see the attached presentation, which we will be going through on the call.

Thanks,
Rahul

Rahul Athalye | O: (510) 482-4420 x237 | C: (919) 802-4655



-----Original Appointment-----

From: Leslie Nelson
Sent: Thursday, May 31, 2018 4:37 PM
To: Leslie Nelson; bach.tsan@sce.com; Cunningham, Kelly; Heidi Hauenstein; JBarbour@semprautilities.com; JMReefe@semprautilities.com; Rahul Athalye; RJMendo1@semprautilities.com; Christopher Kuch; ple2@pge.com; M6AC@pge.com; Michelle.Thomas@sce.com
Cc: charles.kim@sce.com; randall.higa@sce.com; Wiliam.vicent@sce.com
Subject: ASHRAE 90.1 Presentation
When: Monday, June 11, 2018 11:00 AM-12:00 PM (UTC-08:00) Pacific Time (US & Canada).
Where: 415-594-5500; 940-290-811#

Hi All,

As part of the Title 24 Software Advocacy activities, Rahul Athalye from Energy Solutions will be giving a presentation on ASHRAE 90.1. The 2016 edition of ASHRAE Standard 90.1 added the Performance Rating Method (PRM) in Appendix G as a compliance path and fixed the baseline in the PRM to 90.1-2004. This new path allows compliance to be achieved using Appendix G, ensures that the modeling results are as accurate as possible, and provides a single, unified approach for compliance software developers. In this presentation, we will look at how the new compliance path came to be, its benefits, and how a similar approach could benefit Title 24.

Join the meeting: join.me/codes-standards

Monday, June 11, 2018 11:00 AM
Pacific Time (US & Canada)
[In my time zone?](#)

To dial in by phone:

United States - San Francisco, CA
+1.415.594.5500

[More phone numbers](#)

Conference ID:
940-290-811 #

Need to share screen? [Download the app](#)

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

Mendoza, Ray J

From: Leslie Nelson <lnelson@energy-solution.com>
Sent: Wednesday, June 13, 2018 3:56 PM
To: bach.tsan@sce.com; Cunningham, Kelly; Heidi Hauenstein; Barbour, John L; Reefe, Jeremy; Rahul Athalye; Mendoza, Ray J; Christopher Kuch; Michelle.Thomas@sce.com; ple2@pge.com; M6AC@pge.com
Cc: charles.kim@sce.com; randall.higa@sce.com; Wiliam.vicent@sce.com
Subject: [EXTERNAL] ASHRAE 90.1 Presentation
Attachments: 2019T24_Software_Meeting_06.11.18-Notes.docx

Hi All,

Thank you for listening to this presentation and engaging in the discussion that followed. Attached are the notes from this call. The action items I captured are below:

- a. ACTION: Bach and/or Kelly speak with Larry to better understand the history of establishing the residential EDR based on the 2006 IECC and the process CEC used to establish the baselines.
- b. ACTION: Bach and Rahul connect about the work NORESKO and PNNL have been doing to start thinking about the technical work required to establish NR baselines based on ASHRAE 90.1

Thanks!

Leslie Nelson | Associate | lnelson@energy-solution.com | (510) 482-4420 x251 | [449 15th Street, Oakland CA 94612](#)



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

Mendoza, Ray J

Subject: [EXTERNAL] DOE CAC Waivers
Location: join.me: 1.415.594.5500; Passcode: 284-110-425#

Start: Mon 6/18/2018 11:30 AM
End: Mon 6/18/2018 12:00 PM

Recurrence: (none)

Meeting Status: Accepted

Organizer: Bryan Boyce

Hi team – I would like to move this meeting back by a few days to allow for more research into the DOE test procedure changes in 2016. This will allow the meeting to be much more “decision making” focused rather than a “status update” into our current research activities. Also, SCE and SDG&E can hopefully have stronger attendance next week.

Hi All,

DOE has granted three interim waivers to two space-constrained AC/HP manufacturers and a manufacturer of a VS compressor/single speed indoor fan manufacturer.

At this time Marshall and I are not overly concerned with these waivers but the space-constrained waivers may be worth commenting on, we can discuss on the call.

Thanks,

Bryan

You have been invited to a join.me meeting

Join the meeting: join.me/energy_solutions

Thursday, June 14, 2018 11:30 AM
Pacific Time (US & Canada)
[In my time zone?](#)

To dial in by phone:
+1.415.594.5500

Conference ID:
284-110-425 #

Need to share screen? [Download the app](#)

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

Mendoza, Ray J

Subject: [EXTERNAL] Proposed Comment Letter on Cooking Top Petition
Location: 510-858-5509; 2129-7325#

Start: Mon 6/18/2018 12:00 PM
End: Mon 6/18/2018 1:00 PM

Recurrence: (none)

Meeting Status: Accepted

Organizer: Leslie Nelson

Hi All,

This call is to discuss the one-page review form outlining comments to DOE on AHAM's petition for rulemaking regarding the cooking top test procedure. On this call we will talk through the request for comments and the proposed comments.

Hopefully this time works for all – please let me know if there is a need to reschedule. I look forward to speaking with you all!

Thanks,
Leslie

At the scheduled date and time please call:
Participants External to the Oakland Office please call 510-858-5509
When prompted, enter the following Conference ID: 2129-7325, followed by # key.

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

Summary of Test Procedures for Cooking Products – Petition for Rulemaking – Comment Letter to DOE

<p>Topic: Test Procedures for Cooking Products Petition</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th style="width: 60%;">Rulemaking Milestone</th> <th style="width: 40%;">Date</th> </tr> </thead> <tbody> <tr> <td>Petition</td> <td>03/2018</td> </tr> <tr> <td>NOPR</td> <td>TBD</td> </tr> <tr> <td>Final Rule</td> <td>TBD</td> </tr> <tr> <td>Potential Effective Date</td> <td>TBD</td> </tr> </tbody> </table> <p><i>* Italics indicate anticipated dates.</i></p> <p style="margin-top: 20px;">Comment Letter Approval Deadline June 25, 2018</p> <hr/> <p>Rulemaking Summary A petition was submitted by the Association of Home Appliance Manufacturers (AHAM) to withdraw and immediately stay the effectiveness of the conventional cooking top test procedure. The DOE test procedure final rule incorporates by reference sections from a European standard. The DOE extends the test procedure from electric cooktops to gas cooktops as well. AHAM’s petition claims that DOE did not demonstrate that the test procedure is representative or accurate for gas products, the test procedure has high variability and is not repeatable or reproducible, the test procedure is burdensome to conduct, and that the final rule is not supported by adequate data.</p> <hr/> <p>Portfolio Impacts There are no California IOUs with residential conventional cooking top rebate programs.</p> <p>Impact on Voluntary Programs:</p> <p>2016 Programs <input type="checkbox"/></p> <p>Future Programs <input type="checkbox"/></p> <p>No Impact <input checked="" type="checkbox"/></p> <p>Estimated First-Year Savings There are no savings directly related to this test procedure.</p> <p>Involvement by Product Development TBD</p>	Rulemaking Milestone	Date	Petition	03/2018	NOPR	TBD	Final Rule	TBD	Potential Effective Date	TBD	<p>Advocate Comment Letters ASAP is expected to develop an advocate comment letter that likely aligns with many of the recommendations noted here</p> <hr/> <p>Stakeholder Allies</p> <ol style="list-style-type: none"> 1. Efficiency Advocates <p>Industry Opponents</p> <ol style="list-style-type: none"> 1. AHAM 2. Individual manufacturers <hr/> <p>Summary IOU Recommendations to DOE</p> <ol style="list-style-type: none"> 1. DOE conducted a long and rigorous rulemaking with multiple SNOPRs and many opportunities for comment. In our opinion, DOE addressed all comments appropriately, including some of the issues highlighted in this petition. 2. DOE conducted testing and considered testing data from stakeholders during the test procedure rulemaking. We believe this testing was adequate and support DOE’s Final Rule. 3. There is no evidence to suggest consumers use gas cooking tops and electric cooking tops differently. Products with the same utility should be tested the same to demonstrate their performance under the same test conditions. 4. AHAM’s round robin testing used a slightly different test procedure with some variation from the DOE test procedure; therefore AHAM’s results are not conclusive. 5. There is currently not a performance based efficiency standard for cooking tops (though there is a rulemaking), so there is no need to stay the effectiveness of the updated test procedure at this time. 6. A test procedure for electric and gas products is needed for customer transparency of efficiency information.
Rulemaking Milestone	Date										
Petition	03/2018										
NOPR	TBD										
Final Rule	TBD										
Potential Effective Date	TBD										

View the Comment Letter Tracker for the list of upcoming comment letter deadlines:
<http://confluence.energy-solution.net/x/cQDY>