

A.17-01-013, et al.
SDG&E 2018-2025 EE Rolling Portfolio Business Plan
ORA DATA REQUEST No. ORA-A1701013-SDGE004 Dated July 26, 2017
Submitted: August 9, 2017

Department of Energy (DOE) Request for Information (RFI) on Executive Order 13771
(Questions 1 and 2)

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

SDG&E Response:

For question 1, the draft and final RFI documents pertaining Executive Order 13771 are provided in folder Q1, sub folder Drafts-Final, filename:

2017 DOE RFI for Exec Order 13771 Draft and Final Documents- ORA DR Question 1.

For all corresponding emails please refer to folder Q1, sub folder Directory. The spreadsheet titled ***ORA-A1701013-SDGE004_Questions 1_RFI.xls*** provides a "data dictionary" and tabs which include the list of emails from each individual responder. Within the Docs sub folder are the **actual** emails from each responder identified within the spreadsheet.

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

SDG&E Response:

Please refer to Q2, sub folder Docs file name:

Data Request ORA-A1701013-SDGE004_SDGE Response Q2 which contains the July 14, 2017 final docketed comment letter.

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DOE Residential Furnace Rulemaking
(Questions 3, 4 and 5)

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

SDG&E Response:

For question 3, the SDG&E's draft and final comments to the Residential Furnace rulemaking is provided in folder Q3, sub folder Drafts-Final, filenames:

2015 DOE NODA for Furnaces Draft Documents- ORA DR Question #3

2016 DOE SNOPR for Furnaces Documents - ORA DR Question #3.

For all corresponding emails please refer folder Q3, sub folder Directory, please see the workbook titled **ORA-A1701013-SDGE004_Questions 3_Furnace.XLS** which provides a "data dictionary" and tabs which includes the list of emails with each of the individual responders. Within the Docs sub folder are the actual emails from each of the responders identified within the spreadsheet.

Please note for employees no longer employed at the company, SDG&E has not provided those emails because they have not been retained pursuant to SDG&E's standard document retention protocol.

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4) Provide any analysis completed in response to these rulemakings.

SDG&E Response:

Please refer to Q4, sub folder Directory file name:

ORA-A1701013-SDGE004_Questions 4_Furnaces. The spreadsheet provides a “data dictionary” and a tab which includes the email with the individual responder.

The Docs sub folder contains file name:

2016 DOE SNOPR for Furnaces Documents - ORA DR Question #4.

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

SDG&E Response:

SDG&E did not comment on the following DOE Rulemakings:

- a) **EERE-2014-BT-STD-0031**, the 2015-09-14 Energy Conservation Program for Consumer Products: Energy Conservation Standards for Residential Furnaces; Notice of data availability (NODA)
- b) **EERE-2014-BT-STD-0031-0230**, the 2016-09-23 Energy Conservation Program: Energy Conservation Standards for Residential Furnaces; Supplemental notice of proposed rulemaking (SNOPR)

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DOE Rulemaking Non-Response or Non-Support
(Questions 6 and 7)

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

SDG&E Response:

SDG&E did not comment on the proposed efficiency level for the following DOE Comment letters:

- a) **EERE-2014-BT-STD-0031**, the 2015-09-14 Energy Conservation Program for Consumer Products: Energy Conservation Standards for Residential Furnaces; Notice of data availability (NODA)
- b) **EERE-2014-BT-STD-0031-0230**, the 2016-09-23 Energy Conservation Program: Energy Conservation Standards for Residential Furnaces; Supplemental notice of proposed rulemaking (SNOPR)

SDG&E did not support DOE's proposed efficiency level for the following DOE Comment letter:

EERE-2014-BT-STD-0005-0067, the 2016-09-02 Energy Conservation Program: Energy Conservation Standards for Residential Conventional Cooking Products; Supplemental notice of proposed rulemaking (SNOPR)

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

SDG&E Response:

SDG&E did not comment on the proposed efficiency level for two DOE Comment letters for the following reasons:

- a) For **EERE-2014-BT-STD-0031**, the 2015-09-14 Energy Conservation Program for Consumer Products: Energy Conservation Standards for Residential Furnaces; Notice of data availability (NODA), SDG&E did not have the time to analyze the reports and data supplied just prior to the docketing deadline by Southern California Gas Company (SoCalGas), which was not aligned with analysis done by Pacific Gas and Electric Company (PG&E), and therefore it was decided it would not be prudent to sign on to either utility's version of the comment letter without proper vetting of the reports and data. At that point, there was insufficient time and resources for SDG&E to develop its own comment letter, therefore no comment was docketed by SDG&E.
- b) For **EERE-2014-BT-STD-0031-0230**, the 2016-09-23 Energy Conservation Program: Energy Conservation Standards for Residential Furnaces; Supplemental notice of proposed rulemaking (SNOPR), SDG&E could not come to consensus with SoCalGas on the minimum furnace size threshold deemed appropriate for their respective customers, and after conclusion of those discussions, there was insufficient time and resources for SDG&E to dedicate to the additional research necessary to develop its own comment letter, therefore no comment was docketed by SDG&E.

SDG&E did not support DOE's proposed efficiency level for **EERE-2014-BT-STD-0005-0067**, the 2016-09-02 Energy Conservation Program: Energy Conservation Standards for Residential Conventional Cooking Products; Supplemental notice of proposed rulemaking (SNOPR) for the following reason:

The Southern California investor owned utilities (SoCalGas, Southern California Edison and SDG&E) reviewed all product classes within the DOE proposed trial standard level (TSL) 2 and found all calculations and rationale for each to be reasonable, with the exception of Product Class 3 (gas cooking tops). To resolve this customer inequity, while maintaining the viability of commercial-style features, we support TSL 2, but with efficiency level (EL) 0 for Product Class 3.