

PUBLIC UTILITIES COMMISSION

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July 14, 2008

Advice Letter 3877

Ken Deremer  
Director  
Tariffs & Regulatory Accounts  
8330 Century Park Court CP32C  
San Diego, CA 92123-1548

Subject: Proposed High-Efficiency, Ultra Low NOx Water Heater  
Replacement Program

Dear Mr. Deremer:

Advice Letter 3877 is rejected as it does not meet the currently statewide adopted Criteria (D.06-12-038) for the replacement of water heaters under the LIEE program. The water heater replacement criteria is provided within the Statewide LIEE installation Standards adopted by the Commission in an Assigned Commissioner's Ruling dated March 29, 2006 in Rulemaking (R.) 04-01-006 and replacing operational water heaters is not one of the approved criteria.

Sincerely,

A handwritten signature in black ink, appearing to read "Sean H. Gallagher".

Sean H. Gallagher, Director  
Energy Division



**Ken Deremer**  
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June 30, 2008

Advice No. 3877  
(U 904 G)

Public Utilities Commission of the State of California

**Subject: Proposed High-Efficiency, Ultra Low NOx Water Heater Replacement Program**

**Purpose**

Southern California Gas Company (SoCalGas) requests California Public Utilities Commission (Commission) approval to 1) expand the existing residential water heater replacement component of its Low Income Energy Efficiency (LIEE) program to include the replacement of operational water heaters found in LIEE-eligible homes with high-efficiency, ultra low nitrogen oxides (NOx) water heaters (ultra low NOx units),<sup>1</sup> and 2) apply unspent LIEE program funds from previous years to pay for the program. SoCalGas has established a cost sharing partnership with Operation Clean Air, Inc. (OCA)<sup>2</sup> whereby OCA will provide funding to cover approximately 30% (or \$250) of the total installation costs of the new water heaters and SoCalGas will use LIEE program dollars to fund the remaining cost of the installation. The source of OCA's funds is the Environmental Protection Agency (EPA) heating grant for which funds must be expended by August 31, 2008. **As such, SoCalGas is requesting the protest period be shortened to 10 days and the Commission review and approve SoCalGas' request as expeditiously, as possible, to avoid the possibility of a lost opportunity to achieve energy savings.** The shortened timeframe is being requested as SoCalGas is required to invoice OCA for all ultra low NOx unit installations by August 15, 2008 as the EPA heating grant funds need to be expended by August 31, 2008. Should Commission approval not be received on or prior to July 15, 2008, SoCalGas believes it will be difficult to install 120 ultra low NOx units and invoice OCA for all installations prior to August 15, 2008.

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<sup>1</sup> Nitrous oxide is a greenhouse gas with an atmospheric lifetime of approximately 120 years. Nitrous oxide's chemical characteristics and interactions in the atmosphere contribute to its significance as a greenhouse gas. Source: <http://www.epa.gov/nitrousoxide/index.html>

<sup>2</sup> OCA is a broad based coalition of all stakeholders in the overlapping issues of air quality and economic prosperity in the San Joaquin Valley of California. Organized as a nonprofit, public benefit corporation, OCA represents numerous key sectors of public and private interests. See [http://www.operationcleanair.org/about\\_us.htm](http://www.operationcleanair.org/about_us.htm) (June 18, 2008).

SoCalGas' proposal assists with California's goal of reducing greenhouse gas emissions by 25% by the year 2020<sup>3</sup> and is aligned with Strategy 2 of the LIEE Section of the California Energy Efficiency Strategic Plan (CEESP).<sup>4</sup>

### **Background**

Water heater replacement is currently a LIEE program measure as adopted by the Commission in Decision (D.) 06-12-038 and replacement generally occurs when there is water leaking from the water heater tank. The water heater replacement criteria is provided within the Statewide LIEE Installation Standards adopted by the Commission in an Assigned Commissioner's Ruling dated March 29, 2006 in Rulemaking (R.) 04-01-006 and replacing operational water heaters is not one of the approved criteria. The utilities' LIEE programs are currently not replacing operational water heaters because the energy savings are small in relation to the total installation cost, resulting in low benefit-cost ratios. Should the water heater energy savings increase or the total LIEE program funds required to install a unit decrease, the result is a rise in the benefit-cost ratios to levels where the replacement of an operational water heater may pass the cost-effectiveness methodology as adopted in D.02-08-034.

D.02-08-034 adopted a methodology for testing the cost-effectiveness of the LIEE program as a whole and of the specific measures offered under that program. This adopted methodology considers the cost-effectiveness of the LIEE program and measures from two perspectives: 1) cost efficiency from the perspective of the non-participant - Utility Cost Test (UCT), and 2) hardship reductions from the perspective of the participant - Modified Participant Test (MPT). To determine LIEE measure cost effectiveness, the measure-specific benefit-cost ratio is compared to average program level ratio for both the UCT and MPT. For a new measure to "pass" and be considered cost effective, its measure-specific benefit-cost ratio must be at least as high as the average program level ratio for both the UCT and MPT. As shown in Table 1, this proposal meets the criteria as required in D.02-08-034 as both the UCT and MPT benefit-cost ratios for ultra low NOx units are well above the 2007 LIEE program level ratios.

**Table 1**

#### **Measure-Specific Benefit-Cost Ratios vs. Program Level Ratios**

	UCT	MPT	TRC
High Efficiency, Ultra Low NOx Water Heaters <sup>5</sup>	0.54	0.82	0.28
2007 LIEE Program Level Cost Effectiveness <sup>6</sup>	0.28	0.68	0.20

<sup>3</sup> Assembly Bill 32, the California Global Warming Solutions Act of 2006.

<sup>4</sup> Strategy 2 of LIEE Section of CEESP, "Pursue collaboration and leveraging of other programs"

<sup>5</sup> UCT and MPT are calculated using the LIEE program dollars required to install an ultra low NOx water heater, which is the total install cost reduced by \$250 per unit (OCA contribution). TRC is calculated using the full installation cost and does not incorporate OCA's contribution.

<sup>6</sup> 2007 Low Income Energy Efficiency Programs Annual Summary and Technical Appendix – Table A-3

## **Proposal**

SoCalGas continues to seek opportunities to reduce energy usage and costs for low-income customers through its LIEE program, and believes that its strategic partnership with OCA will provide customer and societal and environmental benefits. The replacement of standard water heaters with high-efficiency low NOx units will not only provide many years of future energy savings for low-income customers, but will also provide years of future emission reductions and help reduce greenhouse gases. SoCalGas' proposed cost sharing partnership with OCA for the installation of ultra low NOx water heaters follows the Commission's directive that "The utilities' LIEE programs should emphasize long term energy savings that leverage all available resources and are, to the extent cost-effective and practical, integrated with other demand-side programs, such as energy efficiency programs, solar installations, demand response and other programs."<sup>7</sup>

SoCalGas proposes in Application (A.) 08-05-025 to continue water heater replacement under the policies as provided within the Statewide LIEE Installation Standards adopted by the Commission in an Assigned Commissioner's Ruling dated March 29, 2006 in R. 04-01-006. SoCalGas did not propose in A.08-05-025 to replace operational water heaters because of the low benefit-cost ratios when using 100% of LIEE program funding to support the installation.

In an effort to reduce NOx and carbon dioxide emissions, SoCalGas will partner with OCA to fund the installation of ultra low NOx units in LIEE-eligible homes. Such leveraging of funds will reduce the amount of program funding required to install ultra low NOx units and provides benefit-cost ratios that are at or above average program level ratios consistent with the methodology articulated in D.02-08-034. SoCalGas will utilize the existing LIEE contractor infrastructure for the installation of the ultra low NOx units and will claim 100% of the energy savings from the installations.

SoCalGas has already received a commitment from OCA to share the costs for the "early retirement" of approximately 120 operational water heaters. OCA has approval from EPA Region IX and the San Joaquin Valley Air Pollution Control District to use remaining funds from their EPA heating grant for this cost sharing partnership. OCA will contribute up to \$250 or 40% of the total water heater installation cost, whichever is lower. SoCalGas is projecting the total water heater installation cost to be approximately \$900 per unit. Based on this cost, OCA will be contributing \$250 per installation as this amount is less than 40% of the total installation cost. SoCalGas will invoice OCA for all water heater installations by August 15, 2008 as the EPA heating grant funds need to be expended by August 31, 2008.

Table 2 provides the estimated annual achievements associated with replacement of 120 standard water heaters with ultra low NOx units. The therm savings assumes a baseline energy factor of 0.54<sup>8</sup> for existing units and annual domestic hot water energy use of 219 therms.<sup>9</sup>

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<sup>7</sup> Decision 07-12-051, dated December 20, 2007, Conclusions of Law 7

<sup>8</sup> DOE Water Heater Rulemaking Technical Support Document (December 2000). See [http://www.eere.energy.gov/buildings/appliance\\_standards/residential/waterheat\\_0300\\_r.html](http://www.eere.energy.gov/buildings/appliance_standards/residential/waterheat_0300_r.html)

<sup>9</sup> *California Statewide Residential Appliance Saturation Study*, Volume 2 Study Results Final Report prepared for California Energy Commission, prepared by KEMA-XENERGY, Itron, and RoperASW, June 2004, Report No. 300-00-004, Table 2-22.

**Table 2****Estimated Annual Achievements**

Number of Installations	Therm Savings	NOx Reductions (lbs)	CO2 Reduction (lbs)
120	3,600	19.3 <sup>10</sup>	42,120 <sup>11</sup>

**Funding for Proposal**

SoCalGas' LIEE funding level required for the partnership with OCA is approximately \$78,000 and it covers the costs to install 120 ultra low NOx units prior to August 15<sup>th</sup>, 2008. SoCalGas does not seek an increase in its LIEE rate or authorized 2008 funding. Rather, SoCalGas proposes to fund this partnership using unspent LIEE program funds from previous years. As such, this filing will not increase any rate or charge, cause the withdrawal of service, or conflict with any rate schedule or rule.

**Protest**

Anyone may protest this Advice Letter to the Commission. The protest must state the grounds upon which it is based, including such items as financial and service impact, and should be submitted expeditiously. The protest must be made in writing and must be received within 10 days of the date this Advice Letter. There is no restriction on who may file a protest. The address for mailing or delivering a protest to the Commission is:

CPUC Energy Division  
 Attn: Tariff Unit  
 505 Van Ness Avenue  
 San Francisco, CA 94102

Copies of the protest should also be sent via e-mail to the attention of both Maria Salinas ([mas@cpuc.ca.gov](mailto:mas@cpuc.ca.gov)) and to Honesto Gatchalian ([jnj@cpuc.ca.gov](mailto:jnj@cpuc.ca.gov)) of the Energy Division. A copy of the protest should also be sent via both e-mail and facsimile to the address shown below on the same date it is mailed or delivered to the Commission.

<sup>10</sup> Super Efficient Gas Water Heating Appliance Initiative, prepared for California Energy Commission, prepared by Valley Energy Efficiency Corporation, May 2008, Report No. CEC-500-2007-105, page 23. 40 ng/J (or 0.0071 lbs/therm) is assumed to be the baseline unit and the 10 ng/J (or 0.00175 lbs/therm) is for the ultra low NOx unit.

<sup>11</sup> PG&E Carbon Footprint Calculator. Each therm of natural gas savings corresponds to a reduction of 11.7 lbs of CO2. See <http://www.pge.com/myhome/environment/calculator/>

Attn: Sid Newsom  
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**Effective Date**

SoCalGas believes that this Advice Letter is subject to Energy Division disposition and should be classified as Tier 2 (effective after staff approval) pursuant to GO 96-B. SoCalGas respectfully requests that this filing be effective on July 15, 2008, which is 15 calendar days after the date filed. The shortened timeframe is being requested as SoCalGas is required to invoice OCA for all water heater installations by August 15, 2008 as the EPA heating grant funds need to be expended by August 31, 2008. Should Commission approval not be received on or prior to July 15, 2008, SoCalGas believes it will be difficult to install 120 ultra low NOx units and invoice OCA for all installations prior to August 15, 2008.

**Notice**

A copy of this advice letter is being sent to the parties listed on Attachment A, which includes distribution lists from A.08-05-022 and R.07-01-042.

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KEN DEREMER  
Director  
Tariffs and Regulatory Accounts

Attachments

# CALIFORNIA PUBLIC UTILITIES COMMISSION

## ADVICE LETTER FILING SUMMARY ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No. **SOUTHERN CALIFORNIA GAS COMPANY (U 904-G)**

Utility type:

ELC     GAS  
 PLC     HEAT     WATER

Contact Person: Sid Newsom

Phone #: (213) 244-2846

E-mail: snewsom@semprautilities.com

### EXPLANATION OF UTILITY TYPE

ELC = Electric      GAS = Gas  
PLC = Pipeline     HEAT = Heat      WATER = Water

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: 3877

Subject of AL: Proposed High-Efficiency, Ultra Low NOx Water Heater Replacement Program

Keywords (choose from CPUC listing): LIEE

AL filing type:  Monthly  Quarterly  Annual  One-Time  Other \_\_\_\_\_

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #:

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL No

Summarize differences between the AL and the prior withdrawn or rejected AL<sup>1</sup>: N/A

Does AL request confidential treatment? If so, provide explanation: No

Resolution Required?  Yes  No

Tier Designation:  1  2  3

Requested effective date: 7/15/08

No. of tariff sheets: 0

Estimated system annual revenue effect (%): None

Estimated system average rate effect (%): None

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: N/A

Service affected and changes proposed<sup>1</sup>: N/A

Pending advice letters that revise the same tariff sheets: N/A

**Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:**

**CPUC, Energy Division  
Attention: Tariff Unit  
505 Van Ness Ave.  
San Francisco, CA 94102  
mas@cpuc.ca.gov and jnj@cpuc.ca.gov**

**Southern California Gas Company  
Attention: Sid Newsom  
555 West Fifth Street, GT14D6  
Los Angeles, CA 90013-1011  
snewsom@semprautilities.com**

<sup>1</sup> Discuss in AL if more space is needed.

**ATTACHMENT A**

**Advice No. 3877**

**(See Attached Service Lists)**



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