September 15, 2015

By email and U.S. mail

Mr. John Cymbalsky
U.S. Department of Energy
Office of Energy Efficiency and Renewable Energy
Building Technologies Office, EE-5B
1000 Independence Avenue, S.W.
Washington, D.C. 20585-0121

Re: Energy Conservation Program for Consumer Products: Energy Conservation Standards for Residential Furnaces, Docket No. EERE-014-BT-STD-0031.

Dear Mr. Cymbalsky:

On September 14, 2015, the Department of Energy (DOE) published a Notice of Data Availability (NODA), 80 Fed. Reg. 55038, and released two spreadsheets, one on consumer impacts (life-cycle costs/payback periods) and one on national impacts (national energy savings and net present value of national benefits). The NODA states that DOE "has completed a provisional analysis of the potential economic impacts and energy savings that could result from promulgating amended energy conservation standards for residential non-weatherized gas furnaces (NWGFs) that include two product classes defined by input capacity." (80 Fed. Reg. at 55038.) DOE solicits "comments, data and information" that may improve its analysis (*id.* at 55045), and provides parties 30 days from the NODA publication date (*i.e.*, until October 14) to provide these comments.

The American Gas Association (AGA) and the American Public Gas Association (APGA), collectively, the Associations, have been active participants in the subject proceeding and are interested in filing meaningful comments in response to the NODA. However, that is impossible without being provided additional data by DOE underlying and explaining the NODA and the accompanying spreadsheets, and then having a technical conference to discuss the data. The Associations are therefore submitting the accompanying data request, along with a request for a technical conference some 20 days after the data is provided, and a comment date that is at least 60 days after the technical conference.

The Associations are working under the assumption that DOE's request for comments and information is a good faith attempt to explore the indicated subject matter, and it is in that spirit that we ask for the necessary data identified in the attachment and the additional time to analyze the data and provide substantive comments.

Please contact us with any questions. Thank you in advance for your consideration of these requests.

Respectfully submitted,

AMERICAN GAS ASSOCIATION

By: Kathryn Clay
Vice President, Policy Strategy

AMERICAN PUBLIC GAS ASSOCIATION

By: David Schryver
Executive Vice President

cc: Ms. Johanna Hariharan
Ms. Brenda Edwards

Data Request of AGA/APGA
Regarding DOE NODA

Addition information is needed from DOE to permit an understanding and evaluation of the updated or revised input parameters, values, and methodologies contained in the NODA LCC spreadsheet.

NODA LCC Spreadsheet Data Request

1) An updated version of input spreadsheet "rf_nopr_analysis_inputs_2014-02-06.xlsm" that was released with the NOPR LCC spreadsheet. The input spreadsheet contains key information on the LCC calculations and methodology for:

    - contractor markups
    - implementation of the new AHRI shipment data
    - implementation of the new AEO forecast
    - implementation of the new EIA pricing data
    - implementation of updated NWGF input capacity percentiles

2) Supporting data and detailed descriptions of changes in building shell efficiency calculations in the NODA LCC spreadsheet as mentioned on page 16 of "Res Furnace_NODA_2015-09-04.pdf." This is currently referenced in general terms as "described in the LCC spreadsheet."

3) Supporting data and detailed descriptions of changes in climate indices used to adjust energy use as mentioned on page 16 of "Res Furnace_NODA_2015-09-04.pdf." This is currently referenced in general terms as "described in the LCC spreadsheet."

4) Supporting data and detailed descriptions of the "updated engineering analysis" that is referenced in the "*NODA Analysis Update"* sheet under the "Prod Price" changes.

5) Clarification as to whether or not changes have been made to the "*NWGF Switching"* sheet that was omitted from the descriptions of changes in the "*NODA Analysis Updates*" Sheet of the NODA LCC spreadsheet.

Technical Support Documentation

Information requested in this section focuses on descriptions typically included in a DOE technical support document that are needed for a reasonable understanding of changes included in the NODA LCC spreadsheet.

1) Describe the "bug" in the "AFUE Existing" assignment and what was done to correct the bug, with references to specific locations in the NODA LCC spreadsheet.

2) Describe the methodology and rationale for choosing 1.3 vs. 1.7 oversizing factors in the "*Furnace & AC Sizing"* Sheet of the NODA LCC spreadsheet.

3) Describe the methodology used to arrive at the Net Cost percentages included in Tables III.2 and III.3 of "Res Furnace_NODA_2015-09-04.pdf."

4) Describe methodology/logic of implementing dual standard scenario, and downsizing options.

5) The NODA LCC spreadsheet provides a dropdown box (see cell D23 in the Summary tab of the LCC spreadsheet) that provides options for various Standard Scenarios. The options in the dropdown box include Dual Standard selections for input capacities for small furnaces with thresholds of less than or equal to 70, 75, 80, 85 and 90 kBtus/hr. However, the tables included in the NODA do not include the LCC or the NIA spreadsheet results for these scenarios. Please provide the LCC and NIA spreadsheet results for each of these scenarios in a similar fashion that the other scenario results were presented in the NODA.