



AMERICAN PUBLIC GAS ASSOCIATION

September 23, 2011

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Office of Energy Efficiency and Renewable Energy
U.S. Department of Energy
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Mr. Eric Stas
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RE: Energy Conservation Program: Energy Conservation Standards for Residential Furnaces and Residential Central Air Conditioners and Heat Pumps,

Docket No. EERE-2011-BT-STD-0011, RIN 1904-AC06.

Ladies and Gentlemen:

The American Public Gas Association (APGA) respectfully submits the below data requests to enable APGA to complete its comments in response to the Direct Final Rule and related Notice of Proposed Rulemaking (DFR/NOPR) in the above-captioned proceeding.¹ Correspondingly, APGA requests that the October 17, 2011, comment deadline on the DFR/NOPR (and related October 25, 2011, DFR withdrawal date) be extended to dates that provide DOE the time to consider and respond to these data requests and for APGA to conclude a thorough analysis of the DFR/NOPR prior to an amended DFR withdrawal date.

APGA members are directly affected by the manner in which the Department develops energy conservation standards and by the minimum efficiency standards applicable to natural gas appliances. Accordingly, APGA members have a direct and substantial interest in the outcome of this proceeding.

As our professional analysts have been reviewing the analysis and technical support documents provided under the DFR, there are at least three areas where information is not transparent but is critically needed. Below are data requests that would enable us to complete a more thorough review and analysis of the information provided by DOE under this DFR.

- 1.) The analytical tool was designed to be compatible with a previous version of Oracle's Crystal Ball software (version 7.3.2) that is no longer available. The Crystal Ball version that is currently available is the Fusion Edition version 11.1.2.1.0. Please indicate whether (and if so, how) the

analytical tool can be adapted/modified to be compatible with the currently available version of the software or if that is not possible, please indicate that fact and explain how parties are supposed to conduct a meaningful analysis of the analytical tool in those circumstances. ?

- 2.) There are a fixed number of inputs that can be modified by the user within the existing analytical tool (including year, number of samples, AEO 2010 scenarios, and targeted sub-groups). This makes it virtually impossible for the user to evaluate the impact of other important inputs like equipment useful life or cost learning curve. Please indicate how an interested party may expand the number and types of inputs that can be modified by the user or if that is not possible, kindly indicate that fact and explain how parties are supposed to conduct a meaningful analysis without that capability.
- 3.) Portions of the spreadsheet code within the analytical tool are password protected, making it impossible for the user to understand some of the background calculations and assumptions that are being used. Kindly provide the password or if that request is denied, kindly indicate why and explain how parties are supposed to conduct a meaningful analysis without the data behind the password.

APGA analysts have been attempting to work with LBNL (LCC spreadsheet developer) to complete these data requests, but LBNL has not responded to phone and email messages. Due to the timing of our requests, we ask DOE, as the ultimate "owner" of these documents, to respond to the above data requests as soon as possible and, as noted at the outset, and given the importance of the requested data to a meaningful analysis of the DFR, to extend the October 17, 2011, comment deadline (and corresponding October 25, 2011 withdrawal date) to dates that provide DOE the time to consider and respond to these data requests and for APGA to conclude a thorough analysis of the DFR/NOPR prior to the DFR .

Respectfully submitted,



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¹ See *Energy Conservation Program: Energy Conservation Standards for Residential Furnaces and Residential Central Air Conditioners and Heat Pumps*, Direct Final Rule, 76 Fed. Reg. 37,408 (June 27, 2011); see also *Energy Conservation Program: Energy Conservation Standards for Residential Furnaces and Residential Central Air Conditioners and Heat Pumps*, Notice of Proposed Rulemaking, 76 Fed. Reg. 37,549 (June 27, 2011).