

SEC INTERROGATORY #21

INTERROGATORY

[B/1/6, p. 212, 218, 237, 244]

Please confirm that the assumptions for these measures have been developed by Fisher-Nickel Inc., a firm associated with a utility, PG&E. Please confirm that the only other primary source is NGTC, a firm associated with Gaz Metro. Please confirm that these assumptions have not been verified by any independent third party sources.

RESPONSE

All references and sources in the proposed substantiation documents were reviewed by Energy and Resource Solutions (“ERS”), an independent, third party consulting firm engaged by the Technical Evaluation Committee (“TEC”) to draft and provide recommendations and opinions on the Technical Reference Manual (“TRM”) based on best available information. To verify the reasonableness of proposed sources, ERS regularly considered findings from a host of TRMs in comparable jurisdictions.

The sources in question were endorsed by the TEC and the independent third party consultant. At all times, the TRM subcommittee sought to make use of best available information at the time of its review.

Regarding the measures in question, several sources underpin input assumptions for natural gas-heated commercial kitchen equipment, including:

The **Alliance for Water Efficiency** is a stakeholder-based nonprofit organization dedicated to the efficient and sustainable use of water. Headquartered in Chicago, the Alliance serves as a North American advocate for water efficient products and programs, and provides information and assistance on water conservation efforts.

The **American Society for Testing and Materials International** (“ASTM”) is an independent non-profit organization that develops and delivers voluntary consensus standards, including test methods, specifications, classification guides and practices to improve product quality, health and safety and consumer confidence. ASTM International has no official ties to Canada, though it is accredited by the Standards Council of Canada and commonly cited in Canadian government regulations and product requirements.

Witnesses: D. Bullock
L. Kulperger

AutoQuotes is an online catalogue containing product information on over 900,000 devices and technologies with input from more than 550 manufacturers.

ENERGY STAR is a U.S. Environmental Protection Agency (“EPA”) voluntary program. ENERGY STAR promotes the use of energy efficient products, practices, and services through, objective measurement tools, and consumer education.

The **Food Service Technology Center** (“FSTC”) is an independent EPA-recognized fuel-neutral testing facility dedicated to providing unbiased, third-party data on a wide array of commercial foodservice equipment. FSTC is the primary information resource for the EPA’s ENERGY STAR program for commercial food service. The FSTC is considered to be the foremost authority and recognized industry leader in commercial kitchen energy efficiency and appliance performance testing. They are a regularly referenced source for North American TRMs for Food Service related technologies. Products distributed in Ontario are tested at their labs.

The **Natural Gas Technologies Centre** (“NGTC”) was established in 1992 as a non-profit organization operating in the field of technological development and providing on-site and laboratory testing and technology evaluation. NGTC works with a variety of partners, including a number of government agencies, universities and industry associations, as well as natural gas companies and manufacturers.

The **North Eastern Energy Efficiency Partnership** (“NEEP”) is a non-profit organization that accelerates energy efficiency uptake in northeastern and mid-Atlantic US states. Through policy development, education and enterprise, NEEP partners with government, utilities, industry and consumers to help transform markets.

Witnesses: D. Bullock
L. Kulperger