

Garcia, Daniela

From: Garcia, Daniela
Sent: Wednesday, July 5, 2017 2:08 PM
To: Marc Esser
Cc: Bo White
Subject: RE: [EXTERNAL] Re: Re: Re: watersense

Yeah it's a very grey area with the email notification but like you said I think comments are expected so letting the IOUs know once the letter is ready that their review and comments are needed is the norm.

From: Marc Esser [mailto:marc@negawattconsult.com]
Sent: Wednesday, July 5, 2017 1:41 PM
To: Garcia, Daniela <DGarcia3@semprautilities.com>
Cc: Bo White <bo@negawattconsult.com>
Subject: [EXTERNAL] Re: Re: Re: watersense

I think that's fine, although I am surprised by the policy of email first, then tell. IMHO it would be better if we let the others know that we want to develop a letter before we let the EPA know. That way, in case they don't want to do a letter for some reason, they'll have a chance to voice that before we're committed. Or is that academic, because everyone expects it anyway?

Thanks

On Wed, Jul 5, 2017 at 1:04 PM, Garcia, Daniela <DGarcia3@semprautilities.com> wrote:

Thank You Marc for clarifying some of those points, that's really helpful.

I reread the original email that was sent from the consultant to EPA. They sent it on behalf of PGE. So, I think our approach could be:

- 1) **Send an email to EPA on behalf of SCG that advises a letter is being drafted. I will notify IOUs of our email contact/communication.** ~~Let the other IOUs know of our intent to send an email (Our IOU policy is notification after the email has been sent).~~ to the EPA that advises a ~~joint~~ comment letter.
- 2) **Email to IOUs once the letter is developed** asking for comments and feedback by deadline xxxx. ~~to share that we will be our timeline for developing that letter with them, and what we think should be in it, at a high level.~~ Writing the letter will simultaneously help us refine our project plan, and have it agreed upon by all.
- 3) Once all have agreed to ~~the approach & content of the email, send it, and then proceed to develop~~ the letter we submit to EPA.

Does this sound like a good plan?

Daniela Garcia

SoCalGas Customer Programs

Project Manager – Building Codes and Appliance Standards

555 W. 5th Street, Los Angeles, CA 90013 | ML: GT19A6

Office: 213-244-4361 | Mobile: 951-847-1022

DGarcia3@semprautilities.com

From: Marc Esser [mailto:marc@negawattconsult.com]

Sent: Wednesday, July 5, 2017 12:42 PM

To: Garcia, Daniela <DGarcia3@semprautilities.com>

Cc: Bo White <bo@negawattconsult.com>

Subject: [EXTERNAL] Re: Re: watersense

Hi Daniela,

with "data", Stephanie is referring to section VII of her NOI, see attached for quick reference. She is basically looking for stakeholder input on various aspects of the specification EPA is considering to develop.

I agree that whatever we submit to her should be a IOU compromise approved by all. I don't mean for it to necessarily be a generic support statement. We can include detail, and specifically, i think we should point out where her and our research & interests overlap, and where they don't. We should probably also address which of her research questions we anticipate being able to help with. Either way, IMHO we should submit *something* vs. nothing. We (the IOUs) want a relationship and cooperation with the EPA on this topic, and this is a good way to kick that off.

Note the EPA posted a received-comments summary dated June 20 on their web site, so we are running a bit tight. But the CA IOUs are a big enough organization, and our project is only now taking shape, so I don't think it'll be a problem.

So perhaps the thing to do is this....

1) Let the other IOUs know of our intent to send an email to the EPA that advises a joint comment letter. Share our timeline for developing that letter with them, and what we think should be in it, at a high level. Writing the letter will simultaneously help us refine our project plan, and have it agreed upon by all.

2) Once all have agreed to the approach & content of the email, send it, and then proceed to develop the letter.

Thoughts?

Marc

On Wed, Jul 5, 2017 at 8:51 AM, Garcia, Daniela <DGarcia3@semprautilities.com> wrote:

Hi Marc,

I am trying to think this one through a little more, I am not sure how I feel about approaching this. If the IOUs liked the more detailed comments they won't like the general ones of support and with their names on it we would need agreement from all.

The "data" she is referencing in her email. Do we know what the need/ask is?

From: Tanner, Stephanie [mailto:Tanner.Stephanie@epa.gov]

Sent: Friday, March 31, 2017 6:05 AM

To: Sarah Schneider <sschneider@energy-solution.com>; watersense-products@erg.com

Cc: 'm3ak@pge.com' <m3ak@pge.com>; Bijit Kundu <BKundu@energy-solution.com>

Subject: Re: Question re: NOI for Bath & Shower Diverters

The NOI is an open process so we don't have a defined comment period. You have a few months to send in the information, but the sooner we get **data** the better.

Daniela Garcia

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DGarcia3@semprautilities.com

From: Sarah Schneider <sschneider@energy-solution.com>

Sent: Thursday, March 30, 2017 5:56:18 PM

To: watersense-products@erg.com

Cc: Tanner, Stephanie; 'm3ak@pge.com'; Bijit Kundu

Subject: Question re: NOI for Bath & Shower Diverters

Hi WaterSense program staff,

I'd like to find out when EPA will be closing the [NOI comment period for bath and shower diverters](#). Pacific Gas and Electric Company (PG&E) is looking into the questions highlighted in the NOI, and I'd like to get a sense of when we will need to submit comments.

Thank you,

From: Marc Esser [mailto:marc@negawattconsult.com]
Sent: Friday, June 30, 2017 5:06 PM
To: Garcia, Daniela <DGarcia3@semprautilities.com>
Cc: Bo White <bo@negawattconsult.com>
Subject: [EXTERNAL] Re: watersense

Hi Daniela,

turns out it's Stephanie Tanner, not Susan, oops. Here is the email I'd like to send to her, and addressee list. Need help especially with the latter. Please let me know if you'd like me to change anything, and how. Thanks!!

Marc

To Tanner.Stephanie@epa.gov

CC:

Daniela,

Sue?

Mary,

Charles Kim/SCE?

Kate Zeng/SDG&E?

CEC? Jessica Lopez? Higher ups?

PG&E's consultants? Bijit and/or?

Bo

[Attachment: latest version of project and task summary, forthcoming early next week]

Subject: EPA WaterSense NOI to Develop a Draft Specification for Bath and Shower Diverters dated April 27, 2017

Dear Mrs. Tanner,

This memo is on behalf of the California Investor Owned Utilities (CA IOUs), in regards to EPA's aforementioned Notice of Intent.

NegaWatt Consulting has been asked to assist with the development of a comment letter for publication in the subject matter's docket. We anticipate completing the letter approximately by the third week of July. We understand there is presently no formal deadline; we would appreciate a quick note should that change.

We are also assisting the CA IOUs and the California Energy Commission (CEC) with the development of a Codes and Standards Enhancement (CASE) report regarding California's Title 20 Tub Spout Diverter regulations. We understand that you submitted comments to CEC docket 17-AAER-09 on behalf of EPA WaterSense in this regard.

Please find attached our draft project and task summary regarding the Title 20 CASE report for your information.

The CA IOUs look forward to constructive discussions with the EPA on these topics.

Please feel to reach out to us anytime should you have questions or comments. The senior engineer assigned to this project is Mr. Bo White. You can reach him via email at bo@negawattconsult.com, or by phone at (619) 309-4191, extension 17. The project's lead at the CA IOUs is Mrs. Daniela Garcia of SoCalGas. You can reach her at dgarcia3@semprautilities.com or by phone at (951) 847-1022.

Best Regards,

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Marc Esser, on behalf of the California Investor Owned Utilities
NegaWatt Consulting, Inc.
(619) 309-4191 x11
www.negawattconsult.com

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On Fri, Jun 30, 2017 at 10:27 AM, Garcia, Daniela <DGarcia3@semprautilities.com> wrote:

Please see below! Thanks!

Daniela Garcia

SoCalGas Customer Programs

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DGarcia3@semprautilities.com

From: Marc Esser [mailto:marc@negawattconsult.com]
Sent: Thursday, June 29, 2017 4:50 PM
To: Garcia, Daniela <DGarcia3@semprautilities.com>
Cc: Bo White <bo@negawattconsult.com>
Subject: [EXTERNAL] watersense

Hi Daniela,

Bo and I are meeting about tub spouts right now, and I am realizing that I haven't had a chance to reach out to Susan Tanner; I was going to send her an email introducing NegaWatt, that we are working on Tub Spouts for California, and also let her know that we have some comments to her Notice of Intent in the pipeline. My general intention for these comments was for them to be very similar than what I wrote for the CEC a few days ago - supportive, but pending research. (Maybe share our overview plan as well?!) Do you feel we should still do that? I think we need to open the line of communication with her And if so, as SoCalGas or as CA IOUs?

Thanks

Marc

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