

## Gallarzo, Wednesday R

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**From:** Garcia, Daniela  
**Sent:** Monday, August 14, 2017 9:12 AM  
**To:** Gallarzo, Wednesday R  
**Subject:** FW: Tub Spout Diverters - Draft Test Plan  
**Attachments:** TSDs - Comments on Draft Test Plan -8-3-17.docx

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**From:** Osann, Ed [mailto:eosann@nrdc.org]  
**Sent:** Thursday, August 3, 2017 3:39 PM  
**To:** Garcia, Daniela <DGarcia3@semprautilities.com>; Charles Kim <Charles.Kim@sce.com>; Anderson, Mary <M3AK@pge.com>; Barbour, John L <JBarbour@semprautilities.com>  
**Cc:** Marc Esser <marc@negawattconsult.com>; Bo White <bo@negawattconsult.com>  
**Subject:** [EXTERNAL] Re: Tub Spout Diverters - Draft Test Plan

Hi Daniela --

Attached are some recommendations for the TSD test plan. I did not want to repeat Mary's suggestions, but agree with those as well.

I've been consulting with a small group of experts and allies on this topic, and the overarching concern they expressed and reflected here is that the existing test procedure is inadequate for capturing the most likely failure modes for these products, and its poor delineation of test procedures is perhaps masking widespread noncompliance with California's current leakage standard. Therefore, while we need to learn more about product performance through testing, we also need to test in a way that highlights the shortcomings of the current test itself and lays a foundation for recommended revisions to the test method. This might be accomplished through a "core" set of tests accompanied by some "ancillary" tests with fewer specimens and/or shorter run times to explore a particular product attribute or a particular shortcoming of the current test procedure. And of course we can use results from the more refined test procedures to support any revision to the leakage standards that seem appropriate.

Thanks for the invitation to contribute to this effort, and I'd be glad to join a call next week to discuss test plan revisions.

Ed

Edward R. Osann | Senior Policy Analyst

Natural Resources Defense Council | 1152 15<sup>th</sup> Street, NW | Washington, DC 20005

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\* Please consider the environment before printing this email

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**From:** Garcia, Daniela <[DGarcia3@semprautilities.com](mailto:DGarcia3@semprautilities.com)>

**Sent:** Monday, July 31, 2017 11:35 AM

**To:** Charles Kim; Anderson, Mary; Barbour, John L; Osann, Ed

**Cc:** Marc Esser; Bo White

**Subject:** RE: Tub Spout Diverters - Draft Test Plan

All-

Just a reminder to please get back any test plan comments and edits at the earliest.

Thank You,

*Daniela García*

SoCalGas Customer Programs

Project Manager – Building Codes and Appliance Standards

555 W. 5<sup>th</sup> Street, Los Angeles, CA 90013 | ML: GT19A6

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**From:** Garcia, Daniela

**Sent:** Friday, July 21, 2017 1:52 PM

**To:** Charles Kim <[Charles.Kim@sce.com](mailto:Charles.Kim@sce.com)>; Anderson, Mary <[M3AK@pge.com](mailto:M3AK@pge.com)>; [Jessica.Lopez@energy.ca.gov](mailto:Jessica.Lopez@energy.ca.gov); Barbour, John L <[JBarbour@semprautilities.com](mailto:JBarbour@semprautilities.com)>; Osann, Ed <[eosann@nrdc.org](mailto:eosann@nrdc.org)>

**Cc:** Marc Esser <[marc@negawattconsult.com](mailto:marc@negawattconsult.com)>; Bo White <[bo@negawattconsult.com](mailto:bo@negawattconsult.com)>

**Subject:** RE: Tub Spout Diverters - Draft Test Plan

If we could please have any comments by Friday, July 28<sup>th</sup>.

Thank You,

*Daniela García*

SoCalGas Customer Programs

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**From:** Garcia, Daniela

**Sent:** Friday, July 21, 2017 1:24 PM

**To:** 'Charles Kim' <[Charles.Kim@sce.com](mailto:Charles.Kim@sce.com)>; 'Anderson, Mary' <[M3AK@pge.com](mailto:M3AK@pge.com)>; 'Jessica.Lopez@energy.ca.gov' <[Jessica.Lopez@energy.ca.gov](mailto:Jessica.Lopez@energy.ca.gov)>; Barbour, John L <[JBarbour@semprautilities.com](mailto:JBarbour@semprautilities.com)>; 'Osann, Ed' <[eosann@nrdc.org](mailto:eosann@nrdc.org)>

**Cc:** 'Marc Esser' <[marc@negawattconsult.com](mailto:marc@negawattconsult.com)>; Bo White <[bo@negawattconsult.com](mailto:bo@negawattconsult.com)>

**Subject:** Tub Spout Diverters - Draft Test Plan

All,

Attached please find the Tub Spout Diverters Draft Test plan for your input and comments.

Thank You,

*Daniela García*

SoCalGas Customer Programs

Project Manager – Building Codes and Appliance Standards

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