Exhibit No.

Issue: Cost of Service and Rate Design

Witness: H. Edwin Overcast

Type of Exhibit: Surrebuttal Testimony Sponsoring Party: Empire District Electric

Case No. ER-2014-0351

Date Testimony Prepared: March 2015

### Before the Public Service Commission Of the State of Missouri

**Surrebuttal Testimony** 

of

H. Edwin Overcast

**March 2015** 

# SURREBUTTAL TESTIMONY OF H. EDWIN OVERCAST ON BEHALF OF THE EMPIRE DISTRICT ELECTRIC COMPANY BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION CASE NO. ER-2014-0351

1 INTRODUCTION
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- 2 Q. PLEASE STATE YOUR NAME AND BUSINESS AFFILIATION.
- 3 A. H. Edwin Overcast, Director, Enterprise Management Solutions, a Black & Veatch
- 4 Company.
- 5 Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY IN THIS CASE
- 6 BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION
- 7 ("COMMISSION")?
- 8 A. Yes. I filed direct and rebuttal testimony in this case on behalf of The Empire District
- 9 Electric Company ("Empire").
- 10 Q. WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY?
- 11 A. My surrebuttal testimony responds to the rebuttal testimony filed by Commission Staff
- 12 ("Staff") witness Fortson, Staff witness Kliethermes, and Office of the Public Counsel
- 13 ("OPC") Witness Marke. I address issues related to cost of service and rate design, with
- emphasis on the rationale for increasing the customer charge.
- 15 Q. IS THERE ANY VALID REASON BASED ON RATE DESIGN PRINCIPLES OR
- 16 ECONOMIC THEORY NOT TO RAISE THE CUSTOMER CHARGE AS
- 17 **PROPOSED BY EMPIRE?**

The witnesses for Staff and OPC collectively seek to limit the increase to the A. customer charge or to have no increase at all. Their collective positions violate certain fundamental principles of both rate design and economic theory. The concerns they express about the Empire proposal are not well grounded in logic or in the proper role of regulation as it relates to approving just and reasonable rates that provide the utility an opportunity to earn its authorized return. Simply, the recommendations of the Staff and OPC continue to force high use residential customers to subsidize low use customers. In fact, the current rate design is so far from the cost to serve residential all electric customers that Staff's and OPC's proposed rates continue a pattern of undue discrimination within the residential class. I have explained in detail the basis for this discrimination in my rebuttal testimony. I have also noted that with the advent of the mixed monopoly and competition model where customers may substitute distributed generation technologies ("DG") for energy generated by Empire, subsidies result in adverse impacts on all customers. The reason is simple. Subsidies paid by segments of a rate class are not sustainable in the long-run, because competition will drive out any subsidies and shift those burdens to customers who cannot afford to invest in DG.

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- Q. STAFF WITNESS FORTSON DOES NOT AGREE WITH YOU THAT 90.49%
  OF COST RECOVERY ON AN ENERGY BASIS IS SIGNIFICANT. PLEASE
  COMMENT ON THAT CONCLUSION.
- A. It is obvious that 90+% is a significant amount. The argument that because it is no different from other investor owned utilities in the state, makes this percentage somehow trivial, is not logical. The analysis provided by witness Fortson only shows that all of the utilities in Missouri are placed in the untenable long-run position of recovering far too

much of fixed costs in volumetric charges. This means that rates for regulated utilities in the state are highly inefficient. Missouri rates send the wrong price signals to residential and small non-demand metered commercial customers. This results in the resources of the state of Missouri being misallocated and without a good reason for doing so. The maximum value of the energy charge should be set at marginal cost. The Staff's proposed rate design increases the volumetric price to well over twice what a reasonable estimate of marginal cost would be, and efficiency is sacrificed with no more than an unsupported statement that the rates with higher customer charges are not just and reasonable. The evidence in this case shows just the opposite - that even under the Staff's cost of service study (a study which is fatally flawed from a cost causation perspective) - larger use customers are forced to pay costs for smaller customers within the residential class. Further, the burden of excess costs is borne disproportionately by all residential electric customers who are significantly less expensive to serve per unit of energy.

A.

# Q. PLEASE COMMENT ON STAFF WITNESS FORTSON'S DISCUSSION OF BILL IMPACTS ON LOW USE CUSTOMERS.

The discussion of low use customers is flawed. Witness Fortson uses as his first bill comparison, a customer who uses 100 kWh per month. It is unlikely that this is a normal low use customer at all. For example, the Energy Information Administration collects data in a Residential Energy Consumption Survey that provides data for the state of Missouri's 2.3 million residences. The latest data available is for 2009 and is representative of all of the households in the state. In that data, we find that 100% of households have at least one refrigerator. The smallest manual defrost refrigerator at 14

cubic feet uses about 100 kWhs per month. The typical refrigerator uses between 120 and 160 kWh per month. The survey data also shows that 100% of Missouri households have at least one television. A television uses between 37 and 55 kWhs per month based on six hours of operation per day. This simply means that 100 kWhs is not representative of a normal low use customer. More importantly, the survey data indicates that all 2.3 million households have some form of air-conditioning and that 91% of those households have central air-conditioning. An electric window unit would use over 300 kWhs per month in summer months and that assumes an efficient unit and an efficient thermal envelope. Over 65% of the Missouri residences have electric cooking also. Electric cooking for a family of three uses about 100 kWhs per month. Schedule HEO- SR-1 provides a summary of the 2009 survey data for Missouri. When we add lighting and other motor loads such as fans in heating units, the energy used by charging devices and other small electric devices, it is unlikely that even 200 kWhs represents a typical low use residential customer. It is reasonable to conclude based on this data that a small residential customer would average about 400 kWh per month. The proposed increase at that level of use in witness Fortson's bill comparison is 13% or about \$0.25 per day. This can hardly be viewed as an unfair or unreasonable increase for low use customers who do not presently pay for the costs they cause.

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# Q. WHAT IS YOUR CONCLUSION RELATED TO THE STAFF'S RATE DESIGN PROPOSAL?

A. The Staff's rate design proposal is an unsustainable rate design in the face of the mixed monopoly and completion model as a result of DG advances in technology. Staff makes no adjustment to the sales volumes that would be expected as the result of their rate design proposal. Staff's proposal does not provide a reasonable opportunity for Empire to earn its allowed return. Since the Staff's proposal also cannot pass the test that the proposed rates are not unduly discriminatory between customers in the residential class, the rates, as proposed, are not just and reasonable. Finally, the rates are not sustainable in the long-run and must be changed if customers are to pay for the services they use from the utility. The rates proposed by the Staff should not be adopted in this case. The only reasonable result would be to adopt Empire's proposed increase in the customer charge and to adjust the kWh charges to produce the required revenue requirement.

A.

# Q. PLEASE DISCUSS STAFF WITNESS KLIETHERMES' VIEWS RELATIVE TO THE CUSTOMER CHARGE AND CONSERVATION.

At page 1 of her rebuttal testimony, Staff witness Kliethermes states that "Staff recommends the Commission consider the off-setting policy objectives of encouraging and rewarding energy conservation and sending accurate price signals." It is difficult to understand why the Staff believes that there is an off-setting policy objective related to the proposed increase in the customer charge. Sending accurate price signals is fundamental to encouraging and rewarding energy conservation. As I discussed in my rebuttal testimony, the only conflict is if one assumes that the definition of conservation is an absolute reduction in use. There is no basis for the assumption that conservation is absolute reduction and, hence, no basis to argue that a conflict exists between efficient

<sup>1</sup> It should also be noted that the Opinion No. SC93944 requiring solar rebates further improves the economics of DG. The impact will be felt in the Rate Effective Period and will obviously result in the inability of the Staff's rates to provide a reasonable opportunity for the utility to earn its allowed return.

rates and conservation. Further, the incentive to conserve is increased even under Empire's proposed rates. That is, the volumetric charge increases and promotes more uneconomic decisions relative to avoiding the higher volumetric rates. As I note above, this is not proper conservation, but merely avoiding the forced subsidy contained in the proposed rates for larger customers. Indeed, these are the very customers who have the most viable options for DG and also those who are typically the most efficient electric customers if they are not also low income customers.

#### 8 Q. PLEASE DISCUSS THE ARGUMENT RELATED TO "RATE SHOCK".

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At page 2 of her rebuttal testimony, Staff witness Kliethermes states that the advantage of the Staff's proposal is that it recognizes "the principles of rate shock and conservation policy guidance provided by the Commission." There is no rate shock rationale that supports not increasing the customer charge by only \$0.20 per day. More importantly, the principle of rate shock, as applied to utility rate making, is based on the total magnitude of bill increases when a major new plant addition produces overall increases in rates by several multiples of Empire's proposed residential rate increase (7.65%, with an overall increase of 5.45% in Company rates). These rate increases do not approach the level that is commonly considered as rate shock. Further, the solution for rate shock has typically been to phase-in the rate increase over several years. Indeed, Empire believes it is simply taking the first logical step to better and more efficient rates with the redesign of its residential rates. Adding 20 cents per day to the customer charge is not rate shock and does not come close to violating the principle of gradualism.

# Q. DOES STAFF WITNESS KLIETHERMES RELY ON A PRIOR COMMISSION DECISION TO SUPPORT THE STAFF'S PROPOSED CUSTOMER CHARGE?

A. Yes. At page 3 of her rebuttal testimony, witness Kliethermes relies on a prior decision of the Commission where she states that "the Commission rejected a proposed increase to the residential customer charge, noting that increasing the customer charge would send exactly the wrong message to customers and would discourage efforts to conserve electricity."

#### Q. SHOULD THAT DECISION BE DETERMINATIVE FOR THE COMMISSION?

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No. The Commission's decision in this case must reflect the situation with which the Commission is being presented. Here, the evidence will show that the Staff's proposed rates are not just and reasonable and make the current residential undue discrimination worse. Under the principle of gradualism, the Company is proposing a modest step to address the issue of that occurs within the residential class. The process cannot be delayed, as the mixed monopoly and competition model is becoming an integral part of utility ratemaking. For example, the Rocky Mountain Institute has published a report titled "RATE DESIGN FOR THE DISTRIBUTION EDGE: ELECTRICITY PRICING FOR A DISTRIBUTED RESOURCE FUTURE". That report, published in August of 2014, recommends full unbundling for efficient integration of distributed resources that include not only DG but conservation and demand side management ("DSM") as well. In the executive summary the report states "...bundled, volumetric block rates—provide little or no incentive for the deployment and operation of DERs at the times and places where they can create greatest overall benefit. The perpetuation of these pricing structures in the face of ongoing improvement in DER cost and performance and increased adoption of these technologies will result in lost opportunities for cost reduction and inefficient utilization of assets on the part of both customers and utilities."

(Emphasis added). The concept of unbundled rates is described in detail on pages 27-28 of my direct testimony and will not be repeated here. The emphasis required in this case should be on moving toward the goal of unbundling rates and eliminating the inefficiencies in current rates that the Staff proposed rate design will continue and make worse. The Commission has made a positive start in separating distribution demand charges for demand billed customers as a partial unbundling step. Increasing the residential and small commercial customer charges is another small step toward rates that will "avoid lost opportunities for cost reduction and inefficient utilization of assets." The proposed Staff rate design cannot meet that goal and should be rejected.

# 10 Q. DOES OPC WITNESS MARKE OPPOSE THE PROPOSED INCREASE IN THE 11 CUSTOMER CHARGE?

12 A. Yes.

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- 13 Q. HOW DOES OPC WITNESS MARKE DISCUSS HIS OPPOSITION TO THE
  14 PROPOSED CUSTOMER CHARGE INCREASE?
- A. OPC witness Marke sets up a strawman related to his view of the Empire rationale for supporting increased customer costs and then provides counter arguments to the strawman. Witness Marke's strawman is not an accurate portrayal of the evidence filed in this case, nor does it capture the fundamental principles that underlie the proposed increase. In essence, he attempts to refute arguments that are not essential to the proposal to increase the customer charge.
- Q. PLEASE EXPLAIN THE STRAWMAN COMPONENTS AS DISCUSSED BY
  OPC WITNESS MARKE.

A. The first component of his strawman is related to the issue of net metering. With respect to the net metering issue, witness Marke identified the issue by misquoting my testimony. He omitted a very significant word "not" in front of the word "avoided." This is a key concept in the failure of net metering to address the issue of cost recovery. The most common form of DG for residential customers is solar PV rooftop generation. Once installed, these customers become partial requirements customers who require a different set of unbundled services as compared to other residential customers. These customers require the same and potentially more distribution services as full requirements customers, even though they use less energy produced by the utility. The fundamental point is that net metering permits the DG customer to avoid paying for the full cost imposed on the system for the services they use. In this regard, the proposed Empire rate is more favorable in terms of the credit for excess generation, but the proposed rate does not solve the problem of avoiding the payment for the distribution system for the self-generated kWhs consumed by the customer.

### Q. PLEASE DESCRIBE THE AVOIDED DISTRIBUTION PAYMENT PROBLEM.

16 A. This concern reflects two different issues. First, there is the issue of Empire not having a
17 reasonable opportunity to earn its allowed return. The second issue is the issue of cross
18 subsidy that requires non-DG customers to subsidize DG customers. Customers without
19 DG will certainly include low income customers whose rates will rise to cover the
20 revenue shortfall attributable to the DG customer subsidy over time, unless there are
21 some efforts to mitigate this risk in current rate design.

### Q. WHAT IS THE BASIS USED BY OPC WITNESS MARKE TO REJECT THIS

#### **CONCERN?**

A. OPC witness Marke states that net metering is not a valid concern. The only evidence provided to support this conclusion is the current number of net metered customers. The fundamental problem of this approach is the total reliance on the number of net metering customers to date. This evidence ignores a number of significant facts. First, even under Empire's proposed rates, the volumetric charge increases and, if the OPC view is adopted, this increase will be even greater than proposed by Empire. Second, solar DG costs are declining, thus improving the economics of these installations. Third, Empire may be required to offer a standard rebate for solar installations in the future, which could further reduce the costs to the DG customers. There is no basis to dismiss the net metering issue.

#### Q. PLEASE CONTINUE.

A.

The second element of OPC witness Marke's strawman is the idea of appliance efficiency standards as a concern for reduced volumetric use per customer. Witness Marke rejects this argument by stating on page 6 of his rebuttal testimony that "energy efficiency efforts have been minimal in Empire's service territory." The purpose of appliance efficiency standards is to change the relative efficiency of new appliances that come into the market. To state that energy efficiency efforts have been minimal may be true, but it does not capture the essence of the impact these standards have on end use consumption. This is particularly true for Empire because of the electric heating, air conditioning, and water heating loads. Collectively, these are the three largest residential end use loads for Empire. The average life of these appliances is about ten years for a water heater with a tank, 8-15 years for air-conditioners, and 16 years for heat pumps. The average life reflects the frequency of appliance replacement. The higher efficiency standards for the

product's reduces use per customer at the difference between the older units with lower efficiencies when new and even lower efficiencies as the equipment ages and the current efficiency standards, even if there is no efficiency program in the region. The national forecast data included in witness Marke's rebuttal testimony as support for ignoring this issue has several drawbacks. First, the data assumes growth at the national level that differs from a single utility service area. Second, the data assumes changes in the saturation of these appliances over time. Since, as noted above, Missouri has a 100% saturation of air-conditioning (91% central units based on the 2009 data), there is no increase in use absent customer growth in the service area. The actual compound average customer growth rate for Empire over the last five years has been 0.13% and, thus, is not a source of either volume or revenue growth to offset the poor rate designs proposed by Staff and by OPC. The data also cannot take into account the thermal envelope building standards for each state. It is not uncommon for larger newer homes to use less energy than smaller older homes with equal occupancy and age distribution of residents. For all the discussion provided by witness Marke, there is no reason to believe that increasing energy charges will not have an impact on the overall adoption of more efficient appliances and will erode the ability of Empire to earn its allowed return with the OPC proposed rate design.

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# Q. DOES OPC WITNESS MARKE ATTEMPT TO SHOW THAT THE PROPOSED RATE DESIGN WILL ACTUALLY INCREASE ELECTRIC CONSUMPTION?

Yes. Witness Marke cites a study by Christensen Associates (an economic consulting firm) prepared for the Kansas Corporation Commission that found - according to witness Marke – at page 11 "increasing fixed charges can increase electricity use by 1.1 to 6.8%,

varying by utility and season." In fact, that is not what the study showed. The study assumed that a revenue neutral rate change that recovered <u>all fixed costs in a fixed customer charge</u> and significantly reduced the volumetric charge for the amount of costs previously recovered in that kWh charge, would increase electricity use by between 1.1 and 6.8%. As a result, this hyperbole does not apply to the Empire proposal in any sense. It is also worth noting that this study used a short-run price elasticity of 0.2 for residential electric service. For consistencies sake, using these numbers for the Empire case would reduce sales under the Empire residential rate design by over 1.1 million kWh. Under the OPC proposed rate design, the test year sales volume will be reduced by 2.4 million kWhs. I might further note that these numbers demonstrate that Empire has no reasonable opportunity to earn its allowed return, if one merely accepts the price elasticity values that OPC witness Marke found acceptable for evaluating the Empire rate design proposal. This suggests that the OPC should also support an elasticity adjustment for sales in the rate effective period of 0.14% reduction for residential service.

A.

# Q. PLEASE CONTINUE WITH YOUR DISCUSSION OF OPC WITNESS MARKE'S THIRD STRAWMAN.

The third strawman is that "an increase in fixed charges prevents cross-subsidization between customer classes and promotes efficient price signals." This strawman is actually a misstatement of my argument that an increase in fixed charges in this case will begin to resolve the intra-class cross subsidy in residential rates and moves the rates toward more economically efficient rates. This argument is not based on Ramsey prices, as witness Marke asserts, because that has more to do with the allocation of costs than with rate design. The argument for a two part rate is based on work by Ronald Coase

who developed the concept of charging the excess revenue requirement above marginal cost in a customer charge component to attain an economically efficient rate. However, that is not the proposal in this case. The increase in the customer charge merely reduces slightly the subsidization present in existing rates. Yet, despite the increase in the customer charge, further increases in volumetric rates to customers already pay more for service than the cost they cause is made worse. The irony in witness Marke's comments is that he states that despite improving efficiency, the proposal "raises issues in terms of potential price discrimination and fairness." The statement is only true in the sense that Empire could not reduce the current level of discrimination without even larger changes to the rate than proposed. Further, the standard of fairness is almost universally measured by the fact that customers pay the costs they impose on the system. Low use residential customers on the Empire system pay far less than the costs they impose and large residential customers must make up that shortfall. I also find it interesting that witness Marke equates low use customers with low income. Even the data provided by witness Marke, based on California, does not support the conclusion that low income means low use. The graph at page 18 shows that more than half of low income customers are not low use. Further, this data is often misleading because of effects such as college students who live in apartments and would be considered low income, but may not pay their own utility bills from that income. There are also other significant errors in witness Marke's analysis of income and usage. Rather than deal with all of the errors in detail, I will list just a few that make this argument unsound. The analysis ignores the difference in urban and rural poverty on electric use. The analysis fails to reflect the impact of energy efficiency on use by low income customers. Even though they may have fewer appliances, the

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appliances are typically older and less efficient. Similarly, the thermal envelope of low income dwellings is typically much less energy efficient. This is obviously a factor with which witness Marke would agree based on his support of the Low Income Weatherization Program. The analysis does not account for the effect of household size and age distribution of occupants that also impacts use. The bottom line is that detailed analysis of the relationship between income and usage typically finds weak or no correlation between income and usage. The important policy point in this discussion is that it makes no economic sense to send the wrong price signals to all customers to supposedly benefit a few customers. It is far more efficient to address the issues of low income customers directly through other possible options, such as low income rates for qualifying customers.

#### Q. PLEASE COMMENT ON OPC WITNESS MARKE'S CONCLUSIONS.

13 A. Witness Marke makes the following statement in his conclusion related to Empire'sproposal:

Public Counsel believes that raising fixed charges would be a huge shift in energy policy for this Commission as it would effectively take away customers' ability to control their electricity bills and would cancel out any energy efficiency efforts to date. It would also impact low income, renters, and ratepayers on fixed incomes disproportionately raising issues of price discrimination and fairness.

These two sentences are not supported by the evidence in this case. The proposal to increase the customer charge does not depart from the Commission's policy of promoting conservation, but, instead, enhances the policy of promoting efficient demand response including lower long-run costs and more efficient investment in assets for the utility and

its customers. Customers still maintain control of their bills as the result of energy charges well above marginal cost. The conclusion that the increase in the customer charge would cancel out any energy efficiency efforts to date is based on incorrect analysis of an elasticity study and further relies on the concept that all of the energy efficiency responses to date are based on behavioral changes. In fact, most of the energy efficiency gains to date are based on capital investment in appliances, the thermal envelop, fuel switching, and other responses that will not go away with the customer charge increase. The advantages of setting the rates correctly and addressing low income issues directly far outweigh the loss in social welfare from continuation of economically inefficient rates. Finally, there is undue price discrimination or subsidization in the current rates. The discrimination is not based on income but, instead, is based on the departure of rates for all electric customers from the costs they cause. The OPC positions should be rejected, and Empire should begin the transition to fully unbundled rates to unlock the potential of distributed resources in the mixed monopoly and competitive market that electric utilities operate in today.

### 16 Q. DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?

17 A. Yes, it does.

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### **Table HC3.9 Appliances in Homes**

### Million Housing Units, Final

Appliances	МО
Total Homes	2.3
Cooking Appliances	
Stoves (Units With Both	
an Oven and a Cooktop)	
Use a Stove	2.1
1	2.1
2 or More	0.0
Do Not Use a Stove	0.2
Most-Used Stove Fuel	
Electric	1.5
Natural Gas	0.4
Propane/LPG	0.1
Do Not Use a Stove	0.2
Separate Cooktops	
Use a Separate Cooktop	0.3
1	0.3
2 or More	Q
Do Not Use a Separate Cooktop	2.1
Most-Used Separate Cooktop Fuel	
Electric	0.2
Natural Gas	0.1
Propane/LPG	Q
Do Not Use a Separate Cooktop	2.1
Separate Wall Ovens	
Use a Separate Wall Oven	0.3
1	0.2
2 or More	0.1
Do Not Use a Separate Wall Oven	2.0
Most-Used Separate Wall Oven Fuel	
Electric	0.3
Natural Gas	0.0
Propane/LPG	Q
Do Not Use a Separate Wall Oven	2.0

### SURREBUTTAL SCHEDULE HEO-SR-1 PAGE 2 OF 22

Built-in/Stove-top Grills	
Use a Built-in/Stove-top Grill	0.0
Do Not Use a Built-in/Stove-top Grill	2.3
Built-in/Stove-top Grill Fuel	
Electric	Q
Natural Gas	0
Propane/LPG	N
Do Not Use a Built-in/Stove-top Grill	2.3
Frequency of Hot Meals Cooked	
3 or More Times A Day	0.2
2 Times A Day	0.5
Once a Day	0.8
A Few Times Each Week	0.6
About Once a Week	0.0
Less Than Once a Week	0.1
	• • • • • • • • • • • • • • • • • • • •
No Hot Meals Cooked	Q
Most-Used Cooking Fuel	
Electric	1.7
Natural Gas	0.5
Propane/LPG	0.2
Some Other Fuel	N
Not Specified	Q
No Hot Meals Cooked	Q
Oven Use (For Separate Wall Ovens or	
Ovens in Stoves)	
Use an Oven	2.3
Three or More Times a Day	0.1
Two Times a Day	0.2
Once a Day	0.5
A Few Times Each Week	0.9
Once a Week	0.3
Less than Once a Week	0.3
Do Not Use an Oven	0.1
Microwave Oven	
Use a Microwave Oven	2.3
Do Not Use a Microwave Oven	0.1
Microwave Oven Use	
To Prepare Food	
For Most Meals and Snacks	0.5
For About Half of Meals and Snacks	0.7

### SURREBUTTAL SCHEDULE HEO-SR-1 PAGE 3 OF 22

For Very Few Meals and Snacks	0.8
Used Very Little	0.3
To Defrost Food	
Yes	1.2
No	1.0
Coffee Maker	
Yes	1.6
No	0.7
Toaster Oven	
Yes	0.7
No	1.7
Refrigerators	
Use a Refrigerator	2.3
1	1.7
2 or More	0.6
Do Not Use a Refrigerator	N
Most-Used Refrigerator	
•	
Type of Most-Used Refrigerator	
Single Door	0.1
2 Doors (Top Freezer)	1.2
2 Doors (Bottom Freezer)	0.1
2 Doors (Side-By-Side)	0.9
3 or More Doors	Q
Half-Size/Other	Q
Do Not Use a Refrigerator	N
Age of Most-Used Refrigerator	
Less than 2 Years	0.3
2 to 4 Years	0.5
5 to 9 Years	0.8
10 to 14 Years	0.4
15 to 19 Years	0.1
20 Years or More	0.1
Do Not Use a Refrigerator	N
Size of Most-Used Refrigerator	
Half-Size or Compact	Q
Small (Less than 14 Cubic Feet)	0.1
Medium (15-18 Cubic Feet)	1.0
Large (19-22 Cubic Feet)	1.0
Very Large (More than 22 Cubic Feet)	0.2
Do Not Use a Pefrigerator	N

#### Through-the-Door Ice and Water Service Yes..... 0.9 No..... 1.5 Do Not Use a Refrigerator..... Ν **Defrost Method** Frost-Free..... 2.2 Manual..... 0.2 No Freezer Section..... Q Do Not Use a Refrigerator..... Ν Energy Star (Most-Used) Refrigerator<sup>2</sup> Yes..... 8.0 No..... 0.6 Don't Know..... 0.2 Unit is More Than 9 Years Old..... 0.7 Do Not Use a Refrigerator..... Ν **Second Refrigerator** Use a Second Refrigerator..... 0.6 Do Not Use a Second Refrigerator..... 1.7 Type of Second Refrigerator Single Door..... 0.0 2 Doors (Top Freezer)..... 0.3 2 Doors (Bottom Freezer)..... Q 2 Doors (Side-By-Side)..... 0.1 3 or More Doors..... Ν Half-Size/Other..... 0.1 Do Not Use a Second Refrigerator..... 1.7 Age of Second Refrigerator Less than 2 Years..... 0.0 2 to 4 Years..... 0.1 5 to 9 Years..... 0.2 10 to 14 Years..... 0.1 15 to 19 Years..... 0.1 20 Years or More..... 0.1 Do Not Use a Second Refrigerator..... 1.7 Size of Second Refrigerator Half-Size or Compact..... 0.1 Small (Less than 14 Cubic Feet)..... 0.1 Medium (15-18 Cubic Feet)..... 0.3

### SURREBUTTAL SCHEDULE HEO-SR-1 PAGE 5 OF 22

Large (19-22 Cubic Feet)	0.1
Very Large (More than 22 Cubic Feet)	Q
Do Not Use a Second Refrigerator	1.7
Number of Months	
Turned On Each Year	
Less than 1 Month	Q
1 to 3 Months	Q
4 to 6 Months	Q
7 to 11 Months	Q
Turned On All Year	0.6
Do Not Use a Second Refrigerator	1.7
Separate Freezers	
Use a Separate Freezer	1.0
1	1.0
2 or More	0.1
Do Not Use a Separate Freezer	1.3
Type of Most-Used Freezer	
Upright	0.4
Chest	0.6
Do Not Use a Separate Freezer	1.3
Age of Most-Used Freezer	
Less than 2 Years	0.0
2 to 4 Years	0.1
5 to 9 Years	0.3
10 to 14 Years	0.2
15 to 19 Years	0.1
20 Years or More	0.2
Do Not Use a Separate Freezer	1.3
Size of Most-Used Freezer	
Small (Less than 14 Cubic Feet)	0.3
Medium (15-18 Cubic Feet)	0.5
Large (19-22 Cubic Feet)	0.3
Very Large (More than 22 Cubic Feet)	Q
Do Not Use a Separate Freezer	1.3
Most-Used Freezer Defrost Method	
Frost-Free	0.5
Manual	0.6
Do Not Use a Separate Freezer	1.3
Dishwasher Use	
Use a Dishwasher	1.6

### SURREBUTTAL SCHEDULE HEO-SR-1 PAGE 6 OF 22

	0.3
4 to 6 Times a Week	0.3
2 to 3 Times a Week	0.6
Once Each Week	0.2
Less than Once Each Week	0.2
Do Not Use a Dishwasher	0.8
Age of Dishwasher	
Less than 2 Years	0.2
2 to 4 Years	0.4
5 to 9 Years	0.5
10 to 14 Years	0.2
15 to 19 Years	0.1
20 Years or More	0.1
Do Not Use a Dishwasher	0.8
_	
Energy Star Dishwasher <sup>2</sup>	
Yes	0.6
No	0.4
Don't Know	0.2
Unit is More Than 9 Years Old	0.4
Do Not Use a Dishwasher	0.8
Clothes Washers and Dryers	
Clothes Washer	
Use a Clothes Washer At Home	
Coc a Ciotales Washer At Home	2.1
Top Loading	2.1 1.9
Top Loading	1.9
Top Loading	1.9 0.3
Top Loading	1.9 0.3
Top Loading  Front Loading  Do Not Use a Clothes Washer At Home	1.9 0.3
Top Loading  Front Loading  Do Not Use a Clothes Washer At Home  Age of Clothes Washer	1.9 0.3 0.2
Top Loading  Front Loading  Do Not Use a Clothes Washer At Home  Age of Clothes Washer  Less than 2 Years	1.9 0.3 0.2
Top Loading  Front Loading  Do Not Use a Clothes Washer At Home  Age of Clothes Washer  Less than 2 Years  2 to 4 Years	1.9 0.3 0.2 0.3 0.4
Top Loading  Front Loading  Do Not Use a Clothes Washer At Home  Age of Clothes Washer  Less than 2 Years  2 to 4 Years  5 to 9 Years	1.9 0.3 0.2 0.3 0.4 0.7
Top Loading  Front Loading  Do Not Use a Clothes Washer At Home  Age of Clothes Washer  Less than 2 Years  2 to 4 Years  5 to 9 Years  10 to 14 Years	1.9 0.3 0.2 0.3 0.4 0.7 0.4
Top Loading	1.9 0.3 0.2 0.3 0.4 0.7 0.4 0.1
Top Loading	1.9 0.3 0.2 0.3 0.4 0.7 0.4 0.1 0.1
Top Loading	1.9 0.3 0.2 0.3 0.4 0.7 0.4 0.1 0.2
Top Loading	1.9 0.3 0.2 0.3 0.4 0.7 0.4 0.1 0.1 0.2
Top Loading	1.9 0.3 0.2 0.3 0.4 0.7 0.4 0.1 0.2 2.1 0.9

### SURREBUTTAL SCHEDULE HEO-SR-1 PAGE 7 OF 22

Do Not Use a Clothes Washer At Home	0.2
Usual Water Temperature Setting	
Wash Cycle	
Hot	0.1
Warm	1.0
Cold	1.0
Do Not Use a Clothes Washer At Home	0.2
Rinse Cycle	
Hot	Q
Warm	0.3
Cold	1.8
Do Not Use a Clothes Washer At Home	0.2
Energy Star Clothes Washer <sup>2</sup>	
Yes	0.7
No	0.6
Don't Know	0.2
Unit is More Than 9 Years Old	0.7
Do Not Use a Clothes Washer At Home	0.2
Clothes Dryer	
Use a Clothes Dryer At Home	2.1
Electric	1.9
Natural Gas	0.2
Propane/LPG	Q
Do Not Use a Clothes Dryer At Home	0.2
Age of Clothes Dryer	
Less than 2 Years	0.3
2 to 4 Years	0.4
5 to 9 Years	0.7
10 to 14 Years	0.4
15 to 19 Years	0.1
20 Years or More	0.1
Do Not Use a Clothes Dryer At Home	0.2
Clothes Dryer Use	
Used Every Time Clothes are Washed	1.7
Used For Some, But Not All Loads	0.3
Used Infrequently	Q
Do Not Use a Clothes Dryer At Home	0.2

Rechargeable Portable Tools and Appliances<sup>3</sup>

**Number of Rechargeable Portable** 

### SURREBUTTAL SCHEDULE HEO-SR-1 PAGE 8 OF 22

Tools and Appliances	
0	0.8
1 to 3	1.0
4 to 8	0.3
More than 8	0.1
Portable Tools and Appliances	
Charging Pattern	
Always Plugged In	0.1
Only Recharged When Needed	1.1
Both Ways Are Used	0.2
No Rechargeable Portable	
Tools and Appliances	0.8
Chargers Always Plugged Into Wall <sup>4</sup>	
Yes	0.4
No	1.0
Some, But Not All	0.2
No Rechargeable Portable	
Tools and Appliances	0.8
Other Appliances	
Auto Block/Engine/Battery Heater	N
Filter Systems in Swimming Pools	0.1
Well Water Pumps	Q

<sup>1</sup>Total U.S. includes all primary occupied housing units in the 50 States and the District of Columbia. Vacant housing units, seasonal units, second homes, military housing, and group quarters are excluded.

<sup>2</sup>Energy Star is a joint program of the U.S. Environmental Protection Agency and the U.S. Department of Energy in which household products that meet strict energy efficiency guidelines earn the Energy Star.

<sup>3</sup>Rechargeable Portable Tools and Appliances include handheld vacuum cleaners, flashlights, power drills, and similar equipment.

<sup>4</sup>Yes includes chargers for tools and appliances that are always plugged in.

Q = Data withheld either because the Relative Standard Error (RSE) was greater than 50 percent or fewer than 10 households were sampled.

N = No cases in reporting sample.

Notes: • Because of rounding, data may not sum to totals. • See Glossary for definition of terms used in these tables.

Source: U.S. Energy Information Administration, Office of Energy Consumption and Efficiency Statistics, Forms EIA-457 A and C of the 2009 Residential Energy Consumption Survey.

### **Table HC4.9 Televisions in Homes**

### Million Housing Units, Final

Million Housing Units, Final Televisions	MO
Total Homes	2.3
Televisions	
Number of Televisions	
0	Q
1	0.5
2	0.8
3	0.6
4	0.3
5 or More	0.2
Most-Used Television	
Display Size	
Less than 21 Inches	0.2
21 to 36 Inches	1.2
37 Inches or More	0.9
No Televisions	Q
Display Type	
Standard Tube	1.1
LCD	0.9
Plasma	0.2
Projection	0.1
LED	0.0
No Televisions	Q
Hours Used Per Weekday	
Less than 1 Hour	0.1
1 to 3 Hours	0.5
3 to 6 Hours	0.9
6 to 10 Hours	0.5
More than 10 Hours	0.4
No Televisions	Q
Hours Used Per Weekend Day	
Less than 1 Hour	0.1
1 to 3 Hours	0.3
3 to 6 Hours	0.8
6 to 10 Hours	0.5

### SURREBUTTAL SCHEDULE HEO-SR-1 PAGE 11 OF 22

More than 10 Hours	0.6
No Televisions	Q
Peripherals Connected	
(more than one may apply)	
Combo DVR/Cable Box	0.3
Combo DVR/Satellite Box	0.4
Separate DVR	0.2
Separate Cable Box	0.6
Separate Satellite Box	0.4
Digital Converter Box	0.4
Video Game Console	0.7
Combo VCR/DVD Player	0.6
Separate VCR	0.4
Separate DVD Player	1.2
Home Theater System	0.5
Other Set-Top Box	0.1
No Televisions	Q
Second Most-Used Television	
Display Size	
Less than 21 Inches	0.7
21 to 36 Inches	0.9
37 Inches or More	0.2
Less than 2 Televisions	0.5
Display Type	
Standard Tube	1.1
LCD	0.6
Plasma	0.1
Projection	0.1
LED	Q
Less than 2 Televisions	0.5
Hours Used Per Weekday	
Less than 1 Hour	0.6
1 to 3 Hours	0.6
3 to 6 Hours	0.4
6 to 10 Hours	0.1
More than 10 Hours	0.1
Less than 2 Televisions	0.5
Hours Used Per Weekend Day	
Less than 1 Hour	0.6
1 to 3 Hours	0.6
3 to 6 Hours	0.4

### SURREBUTTAL SCHEDULE HEO-SR-1 PAGE 12 OF 22

6 to 10 Hours	0.2
More than 10 Hours	0.1
Less than 2 Televisions	0.5
Peripherals Connected	
(more than one may apply)	
Combo DVR/Cable Box	0.1
Combo DVR/Satellite Box	0.1
Separate DVR	0.1
Separate Cable Box	0.6
Separate Satellite Box	0.4
Digital Converter Box	0.2
Video Game Console	0.3
Combo VCR/DVD Player	0.3
Separate VCR	0.3
Separate DVD Player	0.6
Home Theater System	0.1
Other Set-Top Box	Q
Less than 2 Televisions	0.5
Third Most-Used Television	
Tillia Most-osea Television	
Display Size	
Less than 21 Inches	0.5
21 to 36 Inches	0.5
37 Inches or More	0.1
Less than 3 Televisions	1.2
Display Type	
Standard Tube	0.8
LCD	0.3
Plasma	0.0
Projection	Q
LED	Q
Less than 3 Televisions	1.2
Hours Used Per Weekday	
Less than 1 Hour	0.6
1 to 3 Hours	0.3
3 to 6 Hours	0.1
6 to 10 Hours	Q
More than 10 Hours	Q
Less than 3 Televisions	1.2
Hours Used Per Weekend Day	
Less than 1 Hour	0.6
1 to 3 Hours	0.3

### SURREBUTTAL SCHEDULE HEO-SR-1 PAGE 13 OF 22

3 to 6 Hours	0.1
6 to 10 Hours	0.1
More than 10 Hours	Q
Less than 3 Televisions	1.2
Peripherals Connected	
(more than one may apply)	
Combo DVR/Cable Box	0.1
Combo DVR/Satellite Box	0.1
Separate DVR	0.0
Separate Cable Box	0.3
Separate Satellite Box	0.2
Digital Converter Box	0.1
Video Game Console	0.1
Combo VCR/DVD Player	0.1
Separate VCR	0.1
Separate DVD Player	0.3
Home Theater System	0.0
Other Set-Top Box	Q
Less than 3 Televisions	1.2

Q = Data withheld either because the Relative Standard Error (RSE) was greater than 50 percent or fewer than 10 households were sampled.

N = No cases in reporting sample.

Notes: • Because of rounding, data may not sum to totals. • See Glossary for definition of terms used in these tables.

Source: U.S. Energy Information Administration, Office of Energy Consumption and Efficiency Statistics, Forms EIA-457 A and C of the 2009 Residential Energy Consumption Survey.

<sup>&</sup>lt;sup>1</sup>Total U.S. includes all primary occupied housing units in the 50 States and the District of Columbia. Vacant housing units, seasonal units, second homes, military housing, and group quarters are excluded.

### **Table HC7.9 Air Conditioning in Homes**

### Million Housing Units, Final

Air Conditioning	MO
Total Homes	2.3
Air Conditioning Equipment	
Use Air Conditioning Equipment	2.3
Have Air Conditioning Equipment But	
Do Not Use It	0.0
Do Not Have Air Conditioning Equipment	Q
Type of Air Conditioning Equipment	
Used (more than one may apply)	
Use Central Air Conditioning Equipment	2.1
Without a Heat Pump	1.9
With a Heat Pump	0.1
Use Window/Wall Air Conditioning Units	0.3
With 1 Unit	0.2
With 2 Units	0.1
With 3 or More Units	Q
Have But Do Not Use Central Air	
Conditioning Equipment	Q
Have But Do Not Use Window/Wall Air	
Conditioning Units	Q
Do Not Have Air Conditioning Equipment	Q
Central Air Conditioning	
Housing Units Served by Central Air Conditioning Equipment <sup>2</sup>	
One Housing Unit	2.0
Two or More Housing Units	Q
Do Not Have or Use Central	
Air Conditioning Equipment	0.3
Usage of Central Air Conditioning	
All Summer	1.2
Quite a Bit	0.4
Only A Few Times When Needed	0.4
Do Not Have or Use Central	
Air Conditioning Equipment	0.3

#### Age of Central Air Conditioning

### SURREBUTTAL SCHEDULE HEO-SR-1 PAGE 15 OF 22

Equipment	
Less Than 2 Years	0.1
2 to 4 Years	0.3
5 to 9 Years	0.6
10 to 14 Years	0.5
15 to 19 Years	0.2
20 Years or More	0.3
Do Not Have or Use Central	
Air Conditioning Equipment	0.3
Routine Service or Maintenance	
Performed on Central Air	
Conditioning Equipment <sup>3</sup>	
Yes	0.8
No	1.3
Do Not Have or Use Central	
Air Conditioning Equipment	0.3
Thermostats	
Have Thermostat for Central Air	
Conditioning Equipment	
Yes	2.0
No	Q
Do Not Have or Use Central	
Air Conditioning Equipment	0.3
Have Programmable Thermostat	
for Central Air Conditioning	
Equipment	
Yes	0.9
No	1.1
No Thermostat or Do Not Have or Use	
Central Air Conditioning Equipment	0.3
Use of Programmable Thermostat	
Adjusts Temperature During Day	
When No One is Home	
Yes	0.5
No	0.4
Adjusts Temperature During	
Sleeping Hours	
Yes	0.5
No	0.4
No Programmable Thermostat or	
Do Not Have or Use Central	
Air Conditioning Equipment	1.4

### **Summer Indoor Temperatures**

Daytime Temperature When	
Someone is Home	
69 Degrees or Less	0.2
70 Degrees	0.3
71 to 73 Degrees	0.4
74 to 76 Degrees	0.4
77 to 79 Degrees	0.3
80 or More Degrees	0.0
Do Not Have or Regularly Use Central	
Air Conditioning Equipment	0.7
Daytime Temperature When	
No One is Home	
69 Degrees or Less	0.1
70 Degrees	0.2
71 to 73 Degrees	0.3
74 to 76 Degrees	0.5
77 to 79 Degrees	0.3
80 or More Degrees	0.2
Do Not Have or Regularly Use Central	
Air Conditioning Equipment	0.7
Temperature at Night	
69 Degrees or Less	0.2
70 Degrees	0.3
71 to 73 Degrees	0.4
74 to 76 Degrees	0.4
77 to 79 Degrees	0.2
80 or More Degrees	0.1
Do Not Have or Regularly Use Central	
Air Conditioning Equipment	0.7
Window/Wall Air Conditioning	
Usage of Most-Used Window/Wall Unit	
All Summer	0.1
Quite a Bit	0.1
Only A Few Times When Needed	0.1
Do Not Have or Use Window/Wall Unit	2.1
Age of Most-Used Window/Wall Unit	
Less Than 2 Years	Q
2 to 4 Years	0.1
5 to 9 Years	Q

### SURREBUTTAL SCHEDULE HEO-SR-1 PAGE 17 OF 22

10 to 14 Years	Q
15 to 19 Years	Q
20 Years or More	Q
Do Not Have or Use Window/Wall Unit	2.1
Energy Star Most-Used	
Window/Wall Unit <sup>4</sup>	
Yes	0.1
No	0.1
Don't Know	Q
Unit More than 9 Years Old	0.1
Do Not Have or Use Window/Wall Unit	2.1
Dehumidifier Use During 2009	
Use a Dehumidifier	0.4
1 to 3 Months	0.2
4 to 6 Months	0.1
7 to 9 Months	0.0
10 to 11 Months	Q
Turned on All Year	0.1
Do Not Use a Dehumidifier	2.0
Use an Evaporative or Swamp Cooler	
(Asked Only in Arid Areas) <sup>5</sup>	
Yes	N
No	N
Not Asked	2.3
Number of Ceiling Fans Used	
0	0.4
1	0.5
2	0.4
3	0.4
4 or More	0.7
Frequency of Most-Used	
Ceiling Fan Use	
All Summer	0.7
Quite a Bit	0.5
Only A Few Times When Needed	0.6
Do Not Have or Use Ceiling Fans	0.5

<sup>1</sup>Total U.S. includes all primary occupied housing units in the 50 States and the District of Columbia. Vacant housing units, seasonal units, second homes, military housing, and group quarters are excluded.

<sup>2</sup>Use of central air conditioning equipment for another housing unit also includes the use of the central air conditioning equipment for a business or farm building as well as another housing unit.

<sup>3</sup>Only includes routine service or maintenance performed in the last year.

<sup>4</sup>Energy Star is a joint program of the U.S. Environmental Protection Agency and the U.S. Department of Energy in which household products that meet strict energy efficiency guidelines earn the Energy Star. The Energy Star questions were only asked of appliances purchased within the past nine years. Older appliances probably do not meet the current Energy Star criteria, and the respondent may not have purchased or remember purchasing the appliance.

<sup>5</sup>Only housing units in Alabama, Arkansas, Arizona, California, Colorado, Georgia, Louisiana, Montana, New Mexico, Nevada, Oklahoma, Oregon, South Carolina, Texas, Utah, and Washington were asked about evaporative coolers.

Q = Data withheld either because the Relative Standard Error (RSE) was greater than 50 percent or fewer than 10 households were sampled.

N = No cases in reporting sample.

Notes: • Because of rounding, data may not sum to totals. • See Glossary for definition of terms used in these tables.

Source: U.S. Energy Information Administration, Office of Energy Consumption and Efficiency Statistics, Forms EIA-457 A and C of the 2009 Residential Energy Consumption Survey.

### **Table HC8.9 Water Heating in Homes**

### Million Housing Units, Final

Water Heating	МО
Total Homes	2.3
Number of Storage Tank Water Heaters	
0	Q
1	2.2
2 or More	0.1
Number of Tankless Water Heaters <sup>2</sup>	
0	2.3
1	0.0
2 or More	N
Main Water Heater	
Main Water Heater Type	
Storage Tank	2.3
Tankless	Q
Do Not Use Hot Water	Q
Housing Units Served by Main Water Heater <sup>3</sup>	
One Housing Unit	2.3
Two or More Housing Units	0.0
Do Not Use Hot Water	Q
Fuel Used by Main Water Heater	
Natural Gas	1.1
For One Housing Unit	1.1
For Two or More Housing Units	Q
Electricity	1.0
For One Housing Unit	1.0
For Two or More Housing Units	Q
Propane/LPG	0.2
Fuel Oil	N
Other	Q
Do Not Use Hot Water	Q
Size of Main Water Heater	
Used by One Housing Unit	
Small (30 Gallons or Less)	0.4

### SURREBUTTAL SCHEDULE HEO-SR-1 PAGE 20 OF 22

Medium (31 to 49 Gallons)	1.4
Large (50 Gallons or More)	0.5
Used by Two or More Housing Units	
Small (30 Gallons or Less)	Q
Medium (31 to 49 Gallons)	Q
Large (50 Gallons or More)	Q
Tankless Water Heater	Q
Do Not Use Hot Water	Q
Age of Main Water Heater	
Less Than 2 Years	0.2
2 to 4 Years	0.4
5 to 9 Years	0.7
10 to 14 Years	0.5
15 to 19 Years	0.2
20 Years or More	0.3
Do Not Use Hot Water	Q
Main Water Heater Insulated With	
Water Heater Blanket	
Yes	0.2
No.	2.1
Tankless Water Heater	Q
Do Not Use Hot Water	Q
55 110, 555 110, 114, 114, 114, 114, 114, 114, 114,	•
Secondary Water Heater	
Secondary Water Heater Type	
Storage Tank	0.1
Tankless	Q
Only One Water Heater or	
Do Not Use Hot Water	2.2
Fuel Head by Casandam: Water Heaten	
Fuel Used by Secondary Water Heater	0.4
Natural Gas	0.1
Electricity	0.0
Propane/LPG	Q
Fuel Oil	N
Other	N
Only One Water Heater or	2.2
Do Not Use Hot Water	2.2
Size of Secondary Water Heater	
Small (30 Gallons or Less)	Q
Medium (31 to 49 Gallons)	0.0
Large (50 Gallons or More)	Q
Tankless Secondary Water Heater	Q

### SURREBUTTAL SCHEDULE HEO-SR-1 PAGE 21 OF 22

Only One Water Heater or	
Do Not Use Hot Water	2.2
Age of Secondary Water Heater	
Less Than 2 Years	Q
2 to 4 Years	Q
5 to 9 Years	0.0
10 to 14 Years	Q
15 to 19 Years	Q
20 Years or More	Q
Only One Water Heater or	
Do Not Use Hot Water	2.2
Hot Tub or Spa and Fuel	
Yes	0.1
Electricity	0.1
Natural Gas	Q
Other	Q
No	2.2
Heated Swimming Pool and Fuel	
Yes	Q
Natural Gas	Q
Electricity	Q
Propane/LPG	N
Other	Q
Pool Not Heated	0.1
No Swimming Pool	1.7
Not Asked (Apartments and Mobile Homes)	0.5
Heated Aquarium (20 gallons or larger)	
Yes	0.1
No	2.3

<sup>1</sup>Total U.S. includes all primary occupied housing units in the 50 States and the District of Columbia. Vacant housing units, seasonal units, second homes, military housing, and group quarters are excluded.

<sup>2</sup>Tankless water heaters, also known as instantaneous or ondemand water heaters, are water heaters that do not contain a storage tank. The water is only heated as it passes through the heat exchanger.

<sup>3</sup>Use of a water heater for another housing unit also includes the use of the water heater for a business or farm building as well as another housing unit.

Q = Data withheld either because the Relative Standard Error (RSE) was greater than 50 percent or fewer than 10 households were sampled.

N = No cases in reporting sample.

Notes: • Because of rounding, data may not sum to totals. • See Glossary for definition of terms used in these tables.

Source: U.S. Energy Information Administration, Office of Energy Consumption and Efficiency Statistics, Forms EIA-457 A and C of the 2009 Residential Energy Consumption Survey.

### **AFFIDAVIT OF H. EDWIN OVERCAST**

STATE OF GEORGIA )
COUNTY OF HENRY )
On the 19th day of March, 2015, before me appeared H. Edwin Overcast, to me personally known, who, being by me first duly sworn, states that he is Director of Management Consulting of Black & Veatch and acknowledged that he has read the above and foregoing document and believes that the statements therein are true and correct to the best of his information, knowledge and belief.
H. Edwin Overcast  H. Edwin Overcast  H. Edwin Overcast
Subscribed and sworn to before me this 19th day of March, 2015
Notary Public  Notary Public

My commission expires: 7.23.2016