

# ORIGINAL

William J. Tait, Jr., Esquire  
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August 9, 2005

Ms. Blanca S. Bayo, Director  
Division of Commission Clerk and  
Administrative Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0870

Re: Consolidated Dockets Nos. 04-0660-EG and 04-0029-EG

Dear Ms. Bayo:

Enclosed please find attached Petitioner's subpoena for Mr. Neil Moyer's appearance at the Commission Hearing in the above-styled consolidated docket currently scheduled for October 10, 2005. Also attached are questions posed to Mr. Moyer for his pre-filed testimony required under the Commission's Order Establishing Procedure and due from the Petitioner by Friday, August 12, 2005.

We are submitting this for filing in the docket 04-0029-EG.

Sincerely,

/s/William J. Tait, Jr.

William J. Tait, Jr.

CMP \_\_\_\_\_ Florida Bar No. 0125081

COM \_\_\_\_\_

CTR \_\_\_\_\_

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DOCUMENT NUMBER-DATE

07739 AUG-9 05

FPSC-COMMISSION CLERK

QUESTIONS FOR NEIL MOYER TO BE ANSWERED FOR PRE-FILED  
TESTIMONY PURSUANT TO SUBPOENA OF SAME DATE

If someone else in your organization is able to answer a question better, please respond to the best of your ability and then indicate the name and title of the person. If that person is willing to provide the answer voluntarily, please have the person answer the first five questions and the question or questions posed in the same format that you use.

1. Please state your name, current position and address.
2. Please provide us your educational background and any special credentials or training that you have received relevant to your testimony in this case.
3. Please provide us with your past and present professional association memberships and positions you have held in those associations.
4. Please provide us with a brief statement of your background and experience in the areas of building science, standards of building practice and programs involving residential energy efficiency and conservation.
5. Please provide us with a brief statement of activities in which you have initiated, supported, and/or managed the establishment and adoption of standards in the areas of residential building construction practices.
6. Have you conducted any research concerning the practice of diagnostic testing of duct systems using methodology referred to as "Pressure Pan" testing? Please describe your research activities and the general results of the research.
7. Have you ever co-authored and manuals or publications concerning the use of Pressure Pans in diagnostic testing of duct systems? Please list the titles and who funded the work?
8. Can the Pressure Pan method be used to quantify duct system leakage, in terms of total leakage and out leakage? If yes, is there a direct conversion, via a mathematical equation, to quantify duct leakage in the system? Please describe, in layman's terms, the basic advantages and disadvantages and limitations of using a Pressure Pan to quantify duct leakage.
9. In general, will testing with a pressure pan locate and quantify the leakage from:
  - a. A supply register inadvertently covered by drywall?
  - b. A hole in the ductwork greater than 5 feet from the register covered by the register?
  - c. Any leakage involved with an air handler assembly and associated plenums located in the garage or attic?

- d. Supply or return junction boxes and components more than 5 ft away from the Pressure Pan connection?
  - e. A return disconnect located in a conditioned space?
10. Please explain the term  $Q_n$  as it relates to duct leakage. What does  $Q_n=.05$  mean in layman's terms? How is  $Q_n$  determined using accepted duct testing methods? How is  $Q_n$  determined by using the Pressure Pan method?
11. Have you performed research on the leakage of air handlers in unconditioned spaces? If so, please describe? On average, what is the leakage of an air handler using standard installation procedures in  $Q_n$  terms?
12. Have you appeared before any state policy-making bodies concerning the use of the Pressure Pan in determining duct leakage? If yes, please describe what governing bodies, the date(s) of your appearances and the purpose of your testimony? What was the result on the issue you testified on? Were associates of Florida Power and Light present at the meeting(s) you attended?
13. Is the Pressure Pan protocol accepted by Florida as a viable method to quantify duct leakage from the State Energy Code or the State BER's system? To the best of your knowledge, is the Pressure Pan methodology for quantifying duct leakage accepted as a viable method anywhere else in the country? If so, where?
14. Does that conclude your testimony?

I have prepared the above pre-filed testimony consisting of \_\_\_\_\_ pages and swear under penalty of perjury that it is true to the best of my knowledge.

\_\_\_\_\_  
Neil Moyer

Sworn to and subscribed before me this  
\_\_\_\_\_ day of \_\_\_\_\_ 2005.

\_\_\_\_\_  
Notary Public  
State of Florida  
My Commission expires: \_\_\_\_\_

