



Accurate Air Engineering, Inc.
Compressed Air Efficiency Services Division
 A Department of Energy Save Energy Now ALLY

April 17, 2012

California Energy Commission
 Attention: Docket No. 12-BSTD-1
 Dockets Office
 1516 Ninth Street, MS-4
 Sacramento, CA 95814

DOCKET	
12-BSTD-1	
DATE	APR 17 2012
RECD.	APR 17 2012

Re: 2013 Building Energy Efficiency Standards: Comments of Accurate Air Engineering, Inc. on Revisions to the California Building Energy Efficiency Standards, California Code of Regulations, Title 24, Part 1 and Part 6 (Docket No. 12-BSTD-1)

Dear California Energy Commission Members:

Accurate Air Engineering, Inc., on behalf of our employees and business partners, is pleased to support the proposed revisions to the California Building Efficiency Standards, California Code of Regulations, Title 24, Part 1 and Part 6. Accurate Air Engineering, Inc. supports the latest code update as a necessary step to drive the latest in energy efficient technology and system design for compressed air systems.

Accurate Air Engineering, Inc. has been in the compressed air business in California since 1964 and has routinely worked within and supported the IOUs programs. As a company with interests in the entire state of California, we appreciate the time and effort the IOUs have taken to consider stakeholder feedback and also appreciate the opportunity to provide comments in this forum. Our comments focus mostly on the terms used, or lack thereof and some minor modifications. We request that you consider our comments below so that code is very clear to all affected stakeholders.

Comments:

“Compressed Air Systems”

- **Operating Pressures** – Though we believe the intent is to cover “typical” industrial compressed air systems with operating pressures between approximately 45 psig and 200 psig, this is not defined. If not defined, then the code could possibly apply to blowers, booster compressors, high pressure air compressors and potentially vacuum systems. We strongly recommend that “Compressed Air Systems” is well defined and believe this should apply to systems operating between 45 psig and 200 psig.
- **Air Compressor Type** – We agree that “all new air systems, and all additions or alterations of compressed systems” should meet the requirements mentioned in subsections 1 through 3 of Section 120.6 (e). We feel that this should apply regardless of air compressor type. Both positive displacement and centrifugal air compressors should be included.

“Trim Compressor and Storage”

- **Effective Trim Capacity** – We feel that the definition of “Effective Trim Capacity” should be removed from Section 100.1, and placed in Section 120.6 (e) 1. In addition, we feel that more effort should be given to clearly defining the term within the code.



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Accurate Air Engineering, Inc's Comments to the CEC on *Title 24, Part 1 and Part 6*
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Cont.

- **Largest Net Capacity Increment** - We feel that the definition of "Largest Net Capacity Increment" should be removed from Section 100.1, and placed in Section 120.6 (e) 1. In addition, we feel that more effort should be given to clearly defining the term within the code.
- **Primary Storage** - We feel that the definition of "Primary Storage" should be removed from Section 100.1, and placed in Section 120.6 (e) 1. In addition, we feel the definition as it now written is subjective and should be revised. If the intent is for the purpose of compressor "control storage", then the storage (air receiver/s) can be placed anywhere after the air compressor/s but prior to the plant distribution piping. If some type of flow device or regulator is used, then the storage should be before these devices.

"Controls"

- **"Approved" Controller** - We are not sure that the intent of the code is to "approve" controllers. Therefore, we recommended that the word "approved" be removed and that the controller only be able demonstrate the desired result, or "choose the most efficient combination of compressors within the system based on the current air demand as measure by a sensor".
- **Compressor Locations** - We believe that most, if not all air compressor automation, management or sequence systems today have the ability to "network" or include all compressors in the control logic, regardless of location. Since the intent of the code regarding "controls" is to "choose the most efficient combination of compressors within the system based on the current air demand as measure by a sensor", we believe that all air compressors within one building should be connected to the new control and measured be a sensor or multiple sensors.

Thank you for consideration of these comments and please contact me at kharris@accurateair.com or (661) 619-2470 if you have any questions,

Sincerely,

Kyle Harris
Division Manager

Cc: Accurate Air Engineering, Inc. Management Team
Mike Bakalyar, Manager, Enhanced Services, Gardner Denver, Inc.