

DOCKETED	
Docket Number:	25-BSTD-03
Project Title:	2028 Energy Code Pre-Rulemaking.
TN #:	270659
Document Title:	TREVOR HEGG Comments - Title 24 Evaporator Specific Efficiencies and AHRI Standard 420
Description:	N/A
Filer:	System
Organization:	TREVOR HEGG
Submitter Role:	Public
Submission Date:	6/17/2026 5:18:51 AM
Docketed Date:	6/17/2026

Comment Received From: TREVOR HEGG

Submitted On: 6/17/2026

Docket Number: 25-BSTD-03

Title 24 Evaporator Specific Efficiencies and AHRI Standard 420

Evapco has intensely advocated and supported helping industries move to meaningful environmental benefits whether it be with energy, water, sound, etc. Assigning specific efficiencies to system components is meaningless and worthless unless the products being used are certified or independently verified! As an example, both CEC and ASHRAE 90.1 require cooling towers and closed-circuit coolers in HVAC systems to be certified in accordance with CTI Standard 201 with reference to industry recognized and accepted test standards ATC-105, ATC-105-S, etc.

I have previously recommended to the CEC and ASHRAE, if certified products are not going to be required AND WHEN a certified product(s) is available for purchase and use, to assign two different values with the value for certified products being lower than the value required for non-certified products if the CEC and ASHRAE are truly interested in energy conservation. This puts some teeth into their efforts and encourages manufacturers to get certified which will ultimately improve system designs. If certified components are not used or the system or component efficiency is not measured or validated, it's just a game of who can lie the best on their product ratings and the true intent of energy reduction is all for naught.

Regardless, what is critical is that the duty point(s) for the specified efficiencies and how thermal capability is to be determined be clearly stated and defined. In the case of evaporators in particular, there can be no gray area as to what TD means (i.e., the difference between the air on temperature to the coil and the saturation temperature at the pressure of the refrigerant leaving the coil). The minimum goal should be to reference AHRI 420 rating conditions and methodology without implying mandatory testing, certification, or compliance verification. To stay in the good graces of AHRI, instead of using the phrase "rated in accordance with AHRI 420", I would propose stating "evaporator performance and resulting specific efficiency determined using the AHRI 420 rating methodology".