



DOCKET

12-BSTD-1

DATE MAY 30 2012

RECD. May 30 2012

May 30, 2012

California Energy Commission (CEC)

Re: 15-Day Language Adoption Hearing for the 2013 Building Energy Efficiency Standards (AHRI Comments on §140.4(e)4; Docket # 12-BSTD-1)

Dear CEC Staff:

The Air-Conditioning, Heating and Refrigeration Institute (AHRI) is the trade association representing manufacturers of heating, cooling, water heating, and commercial refrigeration equipment. Over 300 members strong, AHRI is an internationally recognized advocate for the industry, and develops standards for and certifies the performance of many of the products manufactured by our members. In North America, the annual output of the HVACR industry is worth more than \$20 billion. In the United States alone, our members employ approximately 130,000 people, and support some 800,000 dealers, contractors, and technicians.

We would like to provide some additional comments on the proposed code language in §140.4(e)4 with respect to warranty, sensor accuracy and relief air system:

1. Item 4.A should read “**Warranty.** 5-year warranty of the economizer assembly by the economizer manufacturer”. Although we do not oppose the inclusion of the word manufacturer, we feel that the proposed language could be misinterpreted, thereby laying the onus upon the wrong equipment manufacturers to meet this requirement. In order to ensure that all economizer manufacturers are covered within this requirement, it is necessary to clarify that the manufacturer who produces the economizer is responsible for providing the warranty.
2. The wetbulb temperature tolerance should be eliminated from 4.E.i as it is not used in the requirements.
3. The relative humidity tolerance in 4.E.iii should be eliminated as it is not used in the requirements.
4. Item 4.H should be revised to 90%. 100% exhaust can only be achieved if there is no other exhaust (local bathroom and other exhausts) and there is no envelope leakage. Since these scenarios are impractical, it would be more appropriate to specify 90% instead of 100% in the “Relief air system” subsection.

We appreciate this opportunity to submit comments and urge that CEC reconsider the proposed code language in §140.4(e)4 based on the issues that have been raised in this letter. If you have any questions or wish to discuss this further, please do not hesitate to call me at (703) 600-0383.

Sincerely,

A handwritten signature in black ink, appearing to be 'AR' with a flourish underneath.

Aniruddh Roy
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