

DOCKETED

Docket Number:	15-AAER-01
Project Title:	Appliance Efficiency Rulemaking for Toilets, Urinals, Faucets, HVAC Air Filters, Fluorescent Dimming Ballasts, and Heat Pump Water Chilling Packages
TN #:	203768
Document Title:	Emerson Network Power/Application Engineering re: Comments on Proposed Changes to Title 20
Description:	N/A
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California Energy Commission
Docket No. 15-AAER-01
Docket Unit
1516 Ninth Stree, Mail Station 4
Sacramento, CA 95814-5504

To Whom it may concern:

We are a manufacturer of computer room / data center cooling equipment and have a few comments relative to the proposed changes in Title 20.

Section 1606 Filing by Manufacturers: Listing of Appliances in Database

In Table X on page 37 under Computer Room Air Conditioners:

All the references to chilled water models by Equipment Type and Required Information should not be included in this Standard. They should be deleted.

Justification:

- 1) The current standard does not list chilled water units in Table C-1 of Section 1604.
- 2) There are no minimum efficiencies listed in 10 C.F.R. 431.95, 431.96 or 431.97 for chilled water units
- 3) There are no minimum efficiencies listed in Table C-6 of Section 1605 of Title 20 for chilled water units
- 4) Current testing and certification of chilled water units is per AHRI 1360. ASHRAE 90.1 and the DOE have not developed and minimum efficiencies yet based on this standard until current efficiencies of this type of equipment are understood.

If you need any clarifications, please contact me.

Sincerely,

A handwritten signature in cursive script that reads "Dave Kelley".

Dave Kelley
Director, Application Engineering – Liebert Thermal Management
Emerson Network Power