

## DOCKETED

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<b>Project Title:</b>	Appliance Efficiency Rulemaking for Toilets, Urinals, Faucets, HVAC Air Filters, Fluorescent Dimming Ballasts, and Heat Pump Water Chilling Packages
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April 15, 2015

California Energy Commission  
Docket No. 15-AAER-1  
Docket Unit  
1516 Ninth Street, Mail Station 4  
Sacramento, California 95814-5504

Re: AHRI Comments – 2014 Appliance Efficiency Rulemaking [*Docket No 15-AAER-1*]

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Dear CEC Staff:

These comments are submitted in response to the California Energy Commission (CEC) proposed amendments to Appliance Efficiency Regulations California Code of Regulations, Title 20, Sections 1601 through 1608 released in 45-day language on February 13, 2015.

AHRI is the trade association representing manufacturers of heating, cooling, water heating, and commercial refrigeration equipment. More than 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 appreciate the opportunity to comment on the California Energy Commission (CEC) proposed amendments to Appliance Efficiency Regulations California Code of Regulations, Title 20, Sections 1601 through 1608; however we have several pressing concerns that need to be addressed before this regulation goes into effect.

### **Air Filter Labeling and Directory**

While AHRI understands that CEC's labeling objectives are to improve the longevity and energy efficiency performance of HVAC equipment, we are concerned that any mandatory requirement to label air filters would be onerous for manufacturers and not offer any additional benefit to the consumer. The proposed requirement would force manufacturers to produce California-specific packaging which would not only increase the cost of manufacturing, but also lead to additional challenges in managing inventory.

Air filters are sold across North America, and distribution of these products is generally not split by region. A requirement to provide specific information on the filter for a single state would be cumbersome for manufacturers. Additionally, the process would be rendered inefficient and cause customer confusion if other states adopt a similar approach but specify labeling requirements that are different from those specified by the CEC.

The proposal to certify air filter models in the Appliance Efficiency Database is also expected to be burdensome for manufacturers and provide little value to consumers. We ask that CEC allow the manufacturer to disclose the efficiency and pressure drop ratings on their own websites instead of in the CEC database and on packaging.

### **Computer Room Air Conditioners**

We appreciate CEC's intent to harmonize its Title 20 regulations with federal minimum efficiency standards and test procedures. However, all computer room air conditioners are now federally regulated products, whether air-cooled, water-cooled, glycol-cooled or evaporatively-cooled. While the proposed amendments to Title 20 adopts the federal minimum energy conservation standards for air-cooled, water-cooled and glycol-cooled products, Table C-9 in section 1605.3 continues to reference minimum efficiency standards for evaporatively-cooled products. While the Department of Energy did not establish minimum energy conservation standards for evaporatively-cooled computer room air conditioners, these products became federally covered equipment in 2012 when DOE added the "computer room AC" product class in the code of federal regulation. Consequently we believe that the CEC is preempted from establishing its own state regulations.

In addition, the test procedure referenced in Table C-1 of Section 1604 (i.e. ASHRAE 127-2001) has been withdrawn, and the new edition (i.e. 2012) does not contain a method of test or rating conditions to test and rate evaporatively-cooled computer air conditioners. In fact, there are currently no test procedures available to rate and test these products. So even if CEC believes that it can regulate this product class, manufacturers won't be able to rate their products and meet the minimum efficiency standards listed in Table C-9.

Consequently, we ask that Title 20 be amended to remove the reference to ANSI/ASHRAE 127-2001 in Table C-1 of Section 1604 and that paragraph (b)(2) of Section 1605.3 (including Table C-9) be deleted in its entirety.

### **Data Submittal Requirements for Heat Pumps**

CEC templates for heat pumps (GTHP, LAHP, and VLHP) all currently require the input of "Off mode power consumption;" however, this requirement is premature as there is no test procedure for this metric. On July 8, 2014, U.S. Department of Energy released an enforcement policy statement announcing that it will not assert civil penalty authority

for violation of the off-mode energy consumption standards for residential central air conditioners and heat pumps until 180 days following the publication of the final rule on test procedures.

We request that an exception be added to Section 1606(a)(3)(C) which states that, “On or after January 1, 2015, manufacturers of small air-cooled central air conditioners and small air-source central heat pumps will not be required to report Average Off Mode Power Consumption (Watts) until 180 days after U.S. D.O.E. publishes a final rule establishing a test method for measuring off mode electrical power consumption.” Additionally, we ask that the “Required Information” be updated as follows, “Average Off Mode Power Consumption (Watts) (Until 180 days after U.S. DOE publishes a final rule establishing a test method for measuring off mode electrical power consumption, this is a Voluntary column and may be left blank.)” to indicate this field optional until a test procedure is finalized.

### **Data Submittal Requirements for Residential Furnace Fans**

Another data submittal issue is the requirement of the Fan Energy Rating (FER) for residential furnace fans. The requirement of this metric is premature as the Federal Regulation goes into effect on products manufactured on and after July 3, 2019. We ask that CEC make the FER field optional until it is federally mandatory.

### **Heat-Pump Water Chilling Packages**

We appreciate that CEC has aligned the definition of the “Heat-pump water-chilling package” with ANSI/AHRI STANDARD 550/590 (I-P)-2011 with Addendum 3, *Performance Rating of Water-Chilling and Heat Pump Water-Heating Packages Using the Vapor Compression Cycle*; however, we are concerned that the new testing and reporting requirements will be onerous to manufacturers. Therefore, we request that the Energy Commission not collect this information.

AHRI appreciates the opportunity to provide these comments. If you have any questions regarding this submission, please do not hesitate to contact me.

Sincerely,



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