

## DOCKETED

<b>Docket Number:</b>	15-AAER-01
<b>Project Title:</b>	Appliance Efficiency Rulemaking for Toilets, Urinals, Faucets, HVAC Air Filters, Fluorescent Dimming Ballasts, and Heat Pump Water Chilling Packages
<b>TN #:</b>	204557
<b>Document Title:</b>	Air-Conditioning, Heating, & Refrigeration Institute Comments on 2014 Appliance Efficiency Rulemaking
<b>Description:</b>	15 Day Language
<b>Filer:</b>	Patty Paul
<b>Organization:</b>	Air-Conditioning, Heating, & Refrigeration Institute
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	5/8/2015 4:22:55 PM
<b>Docketed Date:</b>	5/8/2015



we make life better™

2111 Wilson Boulevard Suite 500 Arlington VA 22201-3001 USA  
Phone 703 524 8800 | Fax 703 562 1942  
www.ahrinet.org

May 8, 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 – 15-day Language  
*[Docket No 15-AAER-1]*

---

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 15-day language on April 23, 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 released in the 15-day language; however our concerns expressed thorough our comments to the 45-day language have largely been ignored. We continue to have pressing concerns that need to be addressed before this regulation goes into effect.

### **Computer Room Air Conditioners**

We continue to have issues with CEC's intended regulation of evaporatively-cooled computer room air conditioners. All computer room air conditioners are now federally regulated products, whether air-cooled, water-cooled, glycol-cooled or evaporatively-

cooled. 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**

The proposed revisions to section 1606 add an “average off mode power consumption” reporting requirement for central air conditioners and heat pumps; 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.

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

CEC’s proposal for California-specific packaging and for certification of air filter models in the Appliance Efficiency Database is expected to be burdensome for manufacturers and provide little value to consumers. We again urge 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.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'LPG', with a long horizontal flourish extending to the right.

Laura Petrillo-Groh, PE  
Engineering Manager, Regulatory Affairs  
Direct: (703) 600-0335  
Email: [LPetrillo-Groh@ahrinet.org](mailto:LPetrillo-Groh@ahrinet.org)