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Metric Standard for FEI; Suggested improvements for Air Curtain language

Additional submitted attachment is included below.

Air Movement and Control Association International
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Da: November 3, 2026
To: California Energy Commission
Re: Title 24-2028 Energy Code Pre-Rulemaking (Express Terms), Docket: 25-BSTD-03
Fr: Michael Ivanovich, Senior Director, Advocacy & Education, Air Movement and Control Association (AMCA) International[1], mivanovich@amca.org

AMCA International respectfully submits the following two recommendations for consideration.

1. **Change reference for AMCA 208 to CFR citation for definition of FEI and italicize "fan system design conditions."**

1.1 SECTION 201 DEFINITIONS

FAN ENERGY INDEX (FEI) is the ratio of the electric input power of a reference fan to the electric input power of the actual fan as calculated per ~~ANSI/AMCA 208-18~~ Appendix A to Subpart J of Part 10 *CFR* 431at *fan system design conditions*.(italics added)

AMCA Rationale: The fan test procedure published in the Code of Federal Regulations supersedes the AMCA 208 Standard. The CFR does not explicitly define FEI, but it effectively does to by referencing definitions in ANSI/AMCA Standard 214-21, *Test Procedure for Calculating Fan Energy Index (FEI) for Commercial and Industrial Fans and Blowers (i.e.,* 10 CFR Appendix-A-to-Subpart-J-of-Part-431 0.2.(b)). Additionally, "fan system design conditions" is a defined term and should be in italics.

[1] AMCA International is a not-for-profit association of manufacturers of fans, dampers, louvers, air curtains, and other air-system components for commercial HVAC, industrial-process, and power-generation applications. With programs such as product testing and certification, laboratory accreditation, and international-standards development, its mission is to advance the knowledge, growth, and integrity of the movement and control industry on behalf of more than 400 member companies worldwide.

2. Improve Measurement Accuracy of Air Stream Velocity and Increase Likelihood of Energy Savings

301.2.5 [Section 120.7(e)] **Vestibules.**

Exceptions to Section 301.2.5: Vestibules are not required for the following:

1. Through 5.
6. Doors that have an air curtain with a velocity of not less than 6.56 feet per second ~~at~~ 6 in. above the floor that have been tested in accordance with ANSI/AMCA 220 and installed in accordance with the manufacturer's instructions. ~~*Manual* or *automatic*~~ *Automatic* controls shall be provided that operate the air curtain with the opening and closing of the door.

AMCA Rationale: Measuring six inches above the ground provides a reliable, representative reading of the discharge velocity reaching the threshold. By positioning the test anemometer approximately six inches above the floor, the air curtain airstream will pass cleanly through the measurement sensor. Placing the device directly against the floor results in incorrect readings because the solid floor surface disrupts the flow profile.

Regarding the removal of manual controls, to minimize motor- and heater-energy consumption, automatic controls will energize the fan and heating elements strictly on demand. Relying on manual operation allows the air curtain to run unnecessarily, defeating the primary energy-saving objective. Installing a door switch ensures automatic fan activation whenever the door opens, while a thermostat regulates the heating ON/OFF operation based on actual space temperature and local heating demand.