DOCKETED	
Docket Number:	25-BSTD-03
Project Title:	2028 Energy Code Pre-Rulemaking.
TN #:	273406
Document Title:	Matthew Friedlander Comments - Equation 401point2-D NEW
Description:	N/A
Filer:	System
Organization:	Matthew Friedlander
Submitter Role:	Public
Submission Date:	11/5/2026 3:50:44 PM
Docketed Date:	11/5/2026

Comment Received From: Matthew Friedlander
Submitted On: 11/5/2026
Docket Number: 25-BSTD-03

Equation 401point2-D NEW

The new equation(401.2-D) as proposed under 401.2.1.2.3.2 Demand control ventilation devices is somewhat confusing. I attach a proposed alternative intended to have the same effect.

Additional submitted attachment is included below.

Following is a new equation as proposed under **401.2.1.2.3.2 Demand control ventilation devices**

Vsys-min = Σ (Ra × Az)*DCV* + Σ [the larger of Vex or Vz]other *(Equation 401.2- D [New Equation])*

where:

Vsys-min = The minimum system *outdoor air* ventilation rate, cfm.

Ra = The area-based minimum ventilation airflow rate in Table 401.2-(1) *[Table 120.1-A]*, cfm/ft2.

Az = The net occupiable floor area of the ventilation zone, ft2.

Vex = The design exhaust airflow rate of the space, cfm.

Vz = The zone outdoor airflow rate required by Equation 401.2-B *[Equation 120.1-F]* in Section 401.2.1.1.3 *[Section 120.1(c)3]*, cfm.

The first summation applies to each space served by the system that has one or more CO2 sensors. The second summation applies to all other spaces served by the system.

Proposal: Consider using subscripts enumerated in the list of factors, while retaining the helpful explanation:

$V_{sys\text{-}min} = \Sigma (R_a \times A_{z,DCV}) + \Sigma$ [the larger of $V_{ex,OTHER}$ or $V_{z,OTHER,}$] *(Equation 401.2- D)*

where:

$V_{sys\text{-}min}$ = The minimum system *outdoor air* ventilation rate, cfm.

R_a = The area-based minimum ventilation airflow rate in Table 401.2-(1) *[Table 120.1-A]*, cfm/ft2.

$A_{z,DCV}$ = The net occupiable floor area of the ventilation zone(s) in which DCV is required, ft2.

$V_{ex,OTHER}$ = The design exhaust airflow rate of the ventilation zone(s) in which DCV is not required, as determined by TABLE 401.2-B(32) [TABLE 120.1-B], cfm.

$V_{z,OTHER}$ = The zone outdoor airflow rate of the ventilation zone(s) in which DCV is not required, as determined by Equation 401.2-B *[Equation 120.1-F]* in Section 401.2.1.1.3 *[Section 120.1(c)3]*, cfm.

The first summation applies to each space served by the system that has one or more CO2 sensors. The second summation applies to all other spaces served by the system.