

DOCKETED

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Response to Regulatory Amendments for Air Filter Labeling

Additional submitted attachment is included below.

Air Filter Labeling

Codes and Standards Enhancement (CASE) Initiative
For PY 2017: Title 20 Standards Development

Analysis of Standards Proposal for
Air Filter Labeling
17-AAER-01

September 1, 2017

Prepared for:



PACIFIC GAS &
ELECTRIC COMPANY



SOUTHERN
CALIFORNIA EDISON



A Sempra Energy utility®
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1. Purpose

The Codes and Standards Enhancement (CASE) initiative presents recommendations to support California Energy Commission's (Energy Commission) efforts to update California's Appliance Efficiency Regulations (Title 20) to include new requirements or to upgrade existing requirements for various technologies. The four California Investor Owned Utilities – Pacific Gas and Electric Company, San Diego Gas and Electric, Southern California Edison, and SoCalGas® – sponsored this effort (herein referred to as the Statewide CASE Team). The program goal is to prepare and submit proposals that will result in cost-effective enhancements to improve the energy and water efficiency of various products sold in California.

2. Background

The Statewide CASE Team has been highly involved and engaged with the Energy Commission on the development of standards covering air filter labeling. Throughout 2012 and 2013, the Statewide CASE Team conducted primary research on air filter labels and discussed the topic with subject matter experts. On July 29, 2013, the Statewide CASE Team submitted a CASE Report to the Energy Commission with its recommended approach for testing and labeling air filters. Further, on June 6, 2014 the Statewide CASE team provided a response to the Energy Commission's staff report, and on February 6, 2015, the Statewide CASE Team submitted comments responding to other public comments submitted by other stakeholders docketed with the Energy Commission on the subject. The Statewide CASE Team also provided comments on May 8, 2015 in response to modifications made to the 45-day language, reflected in the 15-day language.

3. Response to Proposed Actions by Energy Commission

As communicated at the August 3, 2017 Energy Commission workshop, the Statewide CASE Team supports the Energy Commission's proposed changes to the regulatory language and submits the following comments:

- Updates to the most current version of test methods promote technical accuracy and ensure proper compatibility of test methods and equipment.
- Changes regarding which filter models must be tested are welcome clarifications. The proposal makes testing requirements easier to understand and encourages greater participation by manufacturers.
- The delay in compliance date is not ideal, but warranted to provide manufacturers ample time to prepare for the regulations.