

DOCKETED

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Project Title:	Appliance Efficiency Standards Emergency Rulemaking for Residential Air Filters
TN #:	216233
Document Title:	Email to AHRI 12-09-2016
Description:	N/A
Filer:	Patrick Saxton
Organization:	California Energy Commission
Submitter Role:	Commission Staff
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Docketed Date:	2/24/2017

Saxton, Patrick@Energy

From: Jacobs, Paul@Energy
Sent: Friday, December 09, 2016 10:44 AM
To: Petrillo-Groh, Laura
Cc: Driskell, Kristen@Energy; Helft, Bruce@Energy; Mohney, Leah@Energy; Berenstein, Maunee@Energy; Ismailyan, David@Energy; Oliver, Kirk@Energy; Shears, Jim@Energy; Spellman, Amanda@Energy; Saxton, Patrick@Energy; Chrisman, Betty@Energy; Amrane, Karim; Davis, Helen
Subject: RE: Title 20 / air filter marking requirement in California--confirming call

Thanks Laura,

We are discussing your request internally.

As mentioned in our call, our Efficiency Division (Kristen Driskell and her team) is lead on this matter.

Paul E. Jacobs
Assistant Executive Director
California Energy Commission
Director, Office of Compliance Assistance and Enforcement
1516 9th Street
Sacramento, CA 95814
paul.jacobs@energy.ca.gov
916.654.4405

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From: Petrillo-Groh, Laura [mailto:LPetrillo-Groh@ahrinet.org]
Sent: Friday, December 09, 2016 5:37 AM
To: Jacobs, Paul@Energy
Cc: Driskell, Kristen@Energy; Helft, Bruce@Energy; Mohney, Leah@Energy; Berenstein, Maunee@Energy; Ismailyan, David@Energy; Oliver, Kirk@Energy; Shears, Jim@Energy; Spellman, Amanda@Energy; Saxton, Patrick@Energy; Chrisman, Betty@Energy; Amrane, Karim; Davis, Helen
Subject: RE: Title 20 / air filter marking requirement in California--confirming call

Hi Paul,

Thanks again to you and your team for meeting with me on Tuesday. Here is a brief call summary, please let me know if CEC has any additions/corrections:

As a follow up to the October webinar and email communication between AHRI and CEC, AHRI requested and extension of the enforcement deadline of one year from the date that questions arising during the webinar (extending test data by calculation; treatment of electronic air filters; confirmation of application of filter regulation to mini-splits) are answered by CEC. AHRI noted that the one year will accommodate 2-6 months of testing (some members offer approximately 300 sizes and types of residential filters), 1-2 months to upload data to CEC database, 2-4 weeks to relabel die cuts, 3-4 weeks for new print plates, 90-120 days to stock supplier, and 90-120 days to stock stores. Several of AHRI members have extensive manufacturing operations (6-12 plants) which will all require upgrades to label all products. AHRI noted that filter manufacturers do not typically have any date codes on the individual filters so it may not be possible to tell when it was made. AHRI will confirm if serial number ties to date of manufacture.

Regarding slight discrepancies between Title 24 Section 150 and Title 20: Title 20 (20 CCR §1604(c)(4)) references that, "Manufacturers shall test small, medium, and large size filters for each grade." AHRI requested clarification on what is defined as "small/medium/large" filter tests for generation of test numbers? A test duct is a linear duct with space for a 24x24 nominal filter. Manufacturers typically can reduce to other sizes or 20x20 for residential products. All other marketing/test information on pressure drop is back calculated using filter size with the understanding that the flow in the test duct is laminar. Clarification on the acceptability of the practice is requested on the acceptability of extending ratings of tested products to other similar filters of different sizes based on airflow as this approach is common practice. AHRI also noted that the efficiency is typically only tested at the largest size and highest airflow and the data is transferred to all sizes. It is imperative that these testing issues are clarified before completion of testing. CEC requested data; however, it is not clear what data they are seeking. Can CEC provide a more specific request?

Our members are also still awaiting that CEC update its guidance on air filter testing to make it clear that the ratings of electronic air filters be established by testing (or appropriate extension of test data by airflow) with the power source engaged. Will CEC update guidance accordingly?

Lastly, AHRI requested confirmation that the scope only applies to filters in ducted unitary equipment and to filters offered for sale to consumers in retail outlets or through distributors. CEC did not provide a response.

Again, thank you for your time. We look forward to keeping an open dialog on this topic. Please let me know how you would like to proceed with the open items from this meeting.

Best,

Laura G. Petrillo-Groh, PE

Senior Engineering Manager, Regulatory Affairs
Air-Conditioning, Heating, and Refrigeration Institute

Phone: 703-600-0335

E-mail: lpetrillo-groh@ahrinet.org

From: Jacobs, Paul@Energy [<mailto:Paul.Jacobs@energy.ca.gov>]

Sent: Tuesday, December 6, 2016 11:44 AM

To: Petrillo-Groh, Laura <LPetrillo-Groh@ahrinet.org>

Cc: Driskell, Kristen@Energy <Kristen.Driskell@energy.ca.gov>; Helft, Bruce@Energy <Bruce.Helft@energy.ca.gov>;

Mohney, Leah@Energy <Leah.Mohney@energy.ca.gov>; Berenstein, Maunee@Energy

<Maunee.Berenstein@energy.ca.gov>; Ismailyan, David@Energy <David.Ismailyan@energy.ca.gov>; Oliver,

Kirk@Energy <Kirk.Oliver@energy.ca.gov>; Shears, Jim@Energy <Jim.Shears@energy.ca.gov>; Spellman,

Amanda@Energy <amanda.spellman@energy.ca.gov>; Saxton, Patrick@Energy <Patrick.Saxton@energy.ca.gov>;

Chrisman, Betty@Energy <Betty.Chrisman@energy.ca.gov>

Subject: RE: Title 20 / air filter marking requirement in California--confirming call

Perfect—thanks Laura for confirming.

From: Petrillo-Groh, Laura [<mailto:LPetrillo-Groh@ahrinet.org>]
Sent: Tuesday, December 06, 2016 8:41 AM
To: Jacobs, Paul@Energy
Cc: Driskell, Kristen@Energy; Helft, Bruce@Energy; Mohney, Leah@Energy; Berenstein, Maunee@Energy; Ismailyan, David@Energy; Oliver, Kirk@Energy; Shears, Jim@Energy; Spellman, Amanda@Energy; Saxton, Patrick@Energy; Chrisman, Betty@Energy
Subject: RE: Title 20 / air filter marking requirement in California--confirming call

Hi Paul,

Thanks for confirming. I look forward to speaking with you at 9:00 am (PST).

Best,

Laura G. Petrillo-Groh, PE
Senior Engineering Manager, Regulatory Affairs
Air-Conditioning, Heating, and Refrigeration Institute
Phone: 703-600-0335
E-mail: lpetrillo-groh@ahrinet.org

From: Jacobs, Paul@Energy [<mailto:Paul.Jacobs@energy.ca.gov>]
Sent: Tuesday, December 6, 2016 11:24 AM
To: Petrillo-Groh, Laura <LPetrillo-Groh@ahrinet.org>
Cc: Driskell, Kristen@Energy <Kristen.Driskell@energy.ca.gov>; Helft, Bruce@Energy <Bruce.Helft@energy.ca.gov>; Mohney, Leah@Energy <Leah.Mohney@energy.ca.gov>; Berenstein, Maunee@Energy <Maunee.Berenstein@energy.ca.gov>; Ismailyan, David@Energy <David.Ismailyan@energy.ca.gov>; Oliver, Kirk@Energy <Kirk.Oliver@energy.ca.gov>; Shears, Jim@Energy <Jim.Shears@energy.ca.gov>; Spellman, Amanda@Energy <amanda.spellman@energy.ca.gov>; Saxton, Patrick@Energy <Patrick.Saxton@energy.ca.gov>; Chrisman, Betty@Energy <Betty.Chrisman@energy.ca.gov>
Subject: RE: Title 20 / air filter marking requirement in California--confirming call

I want to confirm our call at 0900 PST this morning. We will call you.

CEC staff from my office and our Efficiency Division will be present to hear your position on why your industry seeks an extension.

Thanks

Paul E. Jacobs
Assistant Executive Director
California Energy Commission
Director, Office of Compliance Assistance and Enforcement
1516 9th Street
Sacramento, CA 95814
paul.jacobs@energy.ca.gov
916.654.4405

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-----Original Appointment-----

From: Jacobs, Paul@Energy

Sent: Monday, November 28, 2016 10:10 AM

To: Jacobs, Paul@Energy; 'Petrillo-Groh, Laura'

Cc: Driskell, Kristen@Energy; Helft, Bruce@Energy; Mohny, Leah@Energy; Berenstein, Maunee@Energy; Ismailyan, David@Energy; Oliver, Kirk@Energy; Shears, Jim@Energy; Spellman, Amanda@Energy; Saxton, Patrick@Energy; Chrisman, Betty@Energy

Subject: Title 20 / air filter marking requirement in California

When: Tuesday, December 06, 2016 9:00 AM-9:30 AM (UTC-08:00) Pacific Time (US & Canada).

Where: Energy - 3North Conf Rm B for CEC staff and call to Laura Petrillo-Groh at AHRI.

NOTE ROOM CHANGE!