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Docket 17-AAER-06 Commercial and Industrial Fans and Blowers

We suggest you use the metric similar to Energy metric presented by the Department of Energy in 2014. The DOE presented a Best Efficiency Point Metric that was an average of three points:

Fan Energy at Peak Total Efficiency (BEP) + Fan Total Energy at 110 percent of Flow from the BEP + Fan Total Energy at 115% of Flow from the BEP.

This metric is easy to calculate, simple to understand, covers a wide range of fan performance, and allows for low cost and comprehensive enforcement of the metric.

It encourages the fan manufacturer to improve the energy efficiency of the equipment being sold.

The fan type categories accepted by the DOE in the NODA allowed for both small and large ventilation businesses to adjust to the increased efficiency requirements without taxing their resources and allowed for enforcement of this metric, which was the lowest cost and most transparent metric compared to other metrics.

This metric takes into consideration the fan, the motor, any belt/sheave drives, and any motor controller (VFD or ECM).

Other proposed metrics are very complex and difficult to understand, and make enforcement impossible.

We would also suggest that for Agricultural applications the State of California use the long established BESS metric, which simply goes to the heart of energy efficiency ratings, using the output CFM at a given static pressure divided by input Watts.

Agricultural applications can use this metric because they have a very limited CFM/SP range and a limited number of motors/options/accessories (in the 300 range).

The Commercial and Industrial Market cannot use this metric because of the vast about of equipment models/sizes/motors/Controllers/Drives (in the 300 million range). The BEP metric originally presented by the DOE and used by other industries such as Water Pumps would best allow for simplicity and enforcement for Commercial and Industrial Blowers and Fans

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