

DOCKETED

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Project Title:	Commercial and Industrial Fans & Blowers
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Comment Received From: henry [skip] ernst

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comments attached

Additional submitted attachment is included below.

July 7, 2017

California Energy Commission
Docket Unit, MS-4
Re: Docket No. 17-AAER-06
1516 Ninth Street
Sacramento, California 95814-5512

Re: Daikin Applied Comments – Commercial and Industrial Fans [Docket No. 17-AAER-06]

Dear CEC Staff:

These comments are submitted in response to the proposals to regulate commercial and industrial fans in California's Building Energy Efficiency Standards (Title 20). Daikin Applied is headquartered in Plymouth, Minnesota, manufactures commercial HVAC equipment, employs over 5000 people, and is a division of Daikin Industries.

Daikin Applied completely supports the detailed comments submitted by AHRI regarding imbedded fans in HVAC equipment. The proposed fan regulation does not benefit the California consumer of imbedded fans contrary to what DOE implies in their LCC and NIA analyses released in their NODA 3. The DOE analysis greatly overstates the energy savings and understates the development cost impact on manufacturers.

Regarding manufacturer development costs, substituting a more efficient [and normally larger] fan in HVAC equipment almost always results in expensive cabinet redesign, acoustical testing, performance testing, refrigeration testing if part of a unitary package, electrical safety testing, seismic testing, and heat safety testing if gas or electric heat is involved.

Furthermore, California current Title 20 and 24 regulations already cause consumers to select more efficient fans so much of DOE's proposed California energy savings have already occurred.

Finally, regulating components in a product does not generally save energy because other components will be modified to provide the overall product efficiency desired by the customer. However product cost does increase due to the elimination of the optimum components plus the amortization of redesign costs.

Sincerely,

Henry [Skip] Ernst
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