

DOCKETED

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Comments on 2019-NR-MECH1-D Prescriptive Efficiency Requirements for Cooling Towers – Draft Report

I am very supportive of this proposed revision. We performed a similar life cycle cost analysis and found that 80 gpm/HP is cost effective for offices in several climate zones (see http://www.taylor-engineering.com/Websites/taylorengeering/articles/ASHRAE_Journal_-_Optimizing_Design_Control_of_Chilled_Water_Plants_Part_4_Chiller_Cooling_Tower_Selection.pdf). Furthermore, I believe this revision adequately addresses the industry concern that designers will switch to air-cooled by only requiring this increased efficiency on chiller plants that are already required to be water-cooled.