

Public Adviser's Office - Docket # 10-BSTD-01, August 17th, 2011 Staff Workshop Response Letter

From: "Wallace, Joe" <jwallace@hotwater.com>
To: Pao@energy.state.ca.us
Date: 8/30/2011 1:47 PM
Subject: Docket # 10-BSTD-01, August 17th, 2011 Staff Workshop Response Letter
CC: fstanonik@ahrinet.org; jsmelcer@lochivar.com
Attachments: Response Letter-CEC Workshop 17 AUG 11.pdf

The attached pdf file is a response letter to the August 17th, 2011 Staff Workshop – 2013 Building Energy Efficiency Standards”.

It covers proposed changes to the Commercial Boiler requirements.

Please consider these comments,

Thanks,

Joe W.

J. E. Wallace (Joe)
 Certification Engineer
 A. O. Smith Water Products Company
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DOCKET
10-BSTD-01
DATE <u>AUG 31 2011</u>
RECD. <u>SEP 01 2011</u>



August 30th, 2011

Dockets Office, MS-4
California Energy Commission
1516 Ninth Street
Sacramento, CA, 95814-5512
Re: Docket No. 10-BSTD-01

I am with A. O. Smith Water Products Company and I participated in the CEC WebEx on August 17th, covering proposed changes to CEC Title 24. In follow up correspondences, I have also received emails with information pertaining to the proposal. These emails were sent to Mr. Jim Smelcer, Lochinvar Corp., and I in response to questions asked during the WebEx.

We, A. O. Smith, would like to offer a few comments on the proposed changes to the Commercial Boiler requirements.

The CEC Workshop presentation as related to Commercial Boilers appeared to be based on its presentation for Process Boilers. Both presentations refer to three mandatory proposed code changes:

- (1) combustion air positive shutoff,
- (2) combustion fan VFD, and
- (3) parallel position control.

Both presentations also include the same energy analysis and incremental installed and maintenance costs. The presentation and its analysis for Commercial Boilers appeared to be derived from the CEC analysis and proposal for Industrial Process Boilers.

The problem with this is that Industrial Process Boilers are vastly different in design and function when compared to Commercial Space Heating Boilers, complying with ASHRAE Standard 90.1 and the various California NOx requirements, such as those imposed by SCAQMD. Boilers that must comply with those requirements more than adequately address energy efficiency.

It should be noted that the commercial space heating boiler industry, represented by AHRI, is currently reviewing proposed revisions to the next edition of ASHRAE Standard 90.1 to further advance the requirements for energy efficient commercial space heating boilers. We encourage CEC to actively participate in the ASHRAE 90.1 standards process before attempting to casually apply prescriptive requirements for commercial space heating boilers that are intended for industrial process boilers without further considering and analyzing the current technology used for such products in California.

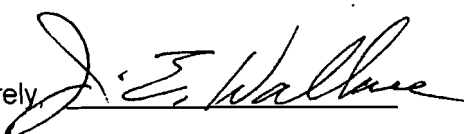
Taking the proposed changes as they are, would lead one to believe that CEC has totally ignored any new technologies that may be available in the industry and decided to make changes that would be design restrictive and possibly detrimental to your intended purpose of being more energy conscious.

I would also like to say that A.O. Smith supports comments submitted to the CEC by Mr. Smelcer, Lochinvar Corp. pointing out technical aspects of the proposal and analysis that are not applicable to commercial space heating boiler designs. Note: These comments were made available in the email exchanges with CEC personnel.

Moreover, the absence of Matthew Tyler during the CEC Workshop left many unanswered questions regarding the possible misapplication of his analysis for commercial boilers. This gave the appearance that CEC was merely going through the motions by presenting the proposal without giving the webinar's participants the benefit of directly engaging the author.

In conclusion, we ask that CEC would delay implementing the proposed changes for Commercial Boilers, with the understanding that better Energy Conscious options are currently available and with the possibility that even better ones will be coming from the proposed ASHRAE 90.1 changes.

Thank you for considering our comments. If any further information or discussion is required, please do not hesitate to contact me.

Sincerely, 

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CC:
Michael McGaraghan – CA IOU Codes and Standards Program
John Farley – CA IOU Codes and Standards Program