

DOCKETED

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2019 Title 24 Energy Code Compliance Manuals and Documents

Additional submitted attachment is included below.

July 3, 2018

California Energy Commission
Attention: Docket No. 18-BSTD-02
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Re: Docket 18-BSTD-02, 2019 Energy Code Compliance Manuals

Dear Sir/Madame:

Unico, Inc. submits the following comments to the California Energy Commission (CEC) 2019 Title 24 Energy Code Compliance Manuals and Documents. Unico is a leading manufacturer of small-duct, high-velocity system under the brand name Unico System. Our products are sold throughout the U.S. and Canada primarily in homes with little or no room for large ducts, or to improve distribution efficiency by keeping the ducts inside the conditioned space.

In reviewing Chapter 4, we have the following comments:

1. Page 4-7, Table 4-3 Minimum Heating Efficiency for Heat Pumps.

There is a typo for Small-duct, high-velocity <65,000 Btu/h. The federal NAECA standard is 7.2, not 7.7 per [10 CFR §430.32\(c\)\(1\)](#). This is effective until January 1, 2023, at which time, the standard switches to the HSPF2 metric with a value of 6.1.

2. Page 4-13, Table 4-6 Minimum Cooling Efficiencies for Central Air Conditioners and Heat Pumps (Cooling Capacity Less Than 65,000 Btu/hour

Again, there is a typo for SDHV appliances. The federal NAECA standard is 12 SEER for both SDHV Air Conditioners and Heat Pumps.

3. Page 4-20, Paragraph 4.3.2.2 Minimum System Airflow

This paragraph appears to conflict with paragraph 4.1.2.1.2 (§150.0(m)13.) for SDHV systems. Consider modifying the paragraph as follows:

“... 350 cfm per ton (or 250 cfm per ton for SDHV systems) ...”.

4. Page 4-22, Paragraph 4.3.3.2 Air Handler Fan Efficacy and System Airflow

Similar to the previous comment, language needs to be added for clarity concerning SDHV systems. Consider modifying as follows:

“... 0.58 watts/CFM (or 0.45 watts/CFM for gas furnaces, or 0.62 watts/CFM for SDHV systems) ...”

“... 350 CFM per nominal cooling ton (or 250 CFM per nominal cooling ton for SDHV systems) ...”

Sincerely,



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