

DOCKETED

| | |
|-------------------------|--|
| Docket Number: | 18-AAER-10 |
| Project Title: | Amendments to Title 20 Appliance Efficiency Regulations Rulemaking |
| TN #: | 224097 |
| Document Title: | Letter from Kaeser Compressors Regarding Concerns of CEC Title 20 Amendments |
| Description: | N/A |
| Filer: | Donna Parrow |
| Organization: | Kaeser Compressors, Inc. |
| Submitter Role: | Public |
| Submission Date: | 7/9/2018 2:36:35 PM |
| Docketed Date: | 7/9/2018 |

Kaeser Compressors, Inc.

P.O. Box 946 ■ Fredericksburg, Virginia 22404 ■ USA

Phone 540-898-5500 ■ Fax 540-898-5520

www.kaeser.com



July 5, 2018

The Honorable J. Andrew McAllister, PhD
Commissioner
California Energy Commission
1516 Ninth Street, MS-34
Sacramento, CA 95814

Via Electronic Mail In Care Of: Donna.Parrow@energy.ca.gov And Website filing with the Commission

Subject: Inclusion of Air Compressors with Amendments Title 20, Sections 1601-1609, California Code or Regulations Docket No. 2018-AAER-10

Dear Commissioner McAllister:

Kaeser Compressors, Inc. has concerns about the proposed changes to Title 20, Sections 1601-1609 that include air compressor testing procedures. While the proposed test procedure does reference the federal test procedure, Title 20 does leave out a good portion of that federal rule. The federal rule is:

10 CFR Parts 429 and 431

[Docket No. EERE-2014-BT-TP-0054]

RIN 1904-AD43

Energy Conservation Program: Test Procedures for Compressors

It was published in Vol. 82, No. 2 of the Federal Register on January 4, 2017.

The fact that Title 20 does not include the entire federal rule may lead to considerable confusion. Title 20 leaves out any mention of 10 CFR Part 429 and many of the definitions listed in the federal rule. We are bringing this to your attention in the belief that this was simply an oversight, as the state regulations would have to be aligned with an existing federal regulation.

Given the amount of work involved in rewriting this proposed change to Title 20, Kaeser Compressors, Inc. would like to suggest that the CEC drop the compressor testing language and make that part of the proposed compressor efficiency standard (Docket No. 2018-AAER-5) that is currently being considered. That would also allow time for the current law suit to compel the USDOE to publish their energy efficiency standard on compressors to make its way through the courts.

Respectfully yours,

A handwritten signature in black ink that reads 'F. Mueller'. The signature is written in a cursive, slightly slanted style.

Frank Mueller
President, Kaeser Compressors, Inc.