

**DOCKETED**

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*Comment Received From: R. Christopher Johnson*  
*Submitted On: 7/10/2018*  
*Docket Number: 18-AAER-10*

**Comments from Compressed Air & Gas Institute**

*Additional submitted attachment is included below.*



July 9, 2018

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

Via Electronic Mail C/O  
Donna.Parrow@energy.ca.gov  
and Website Filing with the Commission

Re: Compressed Air & Gas Institute Comments Regarding Proposed Inclusion of Air Compressors with Amendments to Title 20, Sections 1601-1609, California Code of Regulations Docket No. 2018-AAER-10

Dear Commissioner McAllister:

The Compressed Air & Gas Institute (CAGI) provides the comments below regarding Amendments to Title 20, Sections 1601-1609, California Code of Regulations, Docket No. 2018-AAER-10 related to air compressors. We ask the Commission to defer action on compressors until questions related to federal activity in this area are resolved and activity in a related process in California, in Docket No. 2018-AAER-05, has progressed sufficiently.

Founded in 1915, the Compressed Air and Gas Institute has been serving the compressed air industry and users of compressed air systems for over 100 years. CAGI is the unbiased authority on technical, educational, promotional, and other matters that affect compressed air systems and the compressed air and gas industry. Our membership includes US-based as well as international companies that manufacture compressors and other compressed air system products.

CAGI has been focused on improving efficiency and effectiveness of compressed air systems and compressed air system equipment for decades. We have developed standards, test methods, training programs, educational materials, third party performance verification programs, and other resources designed, ultimately, to assist users of compressed air systems. We believe improved efficiency and effectiveness will lead to more satisfied end users that will continue to use compressed air as their preferred power source.

In the compressed air systems industry, manufacturers already compete on the basis of efficiency, stating and verifying performance data of packaged units that represent true performance that users will experience as they use the equipment. The industry devotes considerable resources to verification of performance by a reputable third party, to education and training designed to improve system-wide efficiency, and to development of international standards that provide consistent test methods that are recognized throughout the world. We believe there have been significant improvements in the efficiency of compressed air systems and equipment as a result of our efforts.

We participated in the development of test procedure rules for compressors promulgated by the US Department of Energy as well as the DOE energy efficiency standards for compressors. Testing of compressors is a complex undertaking, and we wish to eliminate confusion in the industry and to continue to provide end users with accurate, meaningful performance data.

The compressed air systems industry, through CAGI, was forward thinking, taking many actions to support end users and to increase efficiency without regulation. The industry:

- Developed and adopted standards that provided true “wire to air” energy efficiency data that was directly relevant to how the equipment is used.
- Developed and provided a standard means of reporting performance data to the public.
- Verified performance through a costly third party verification program.
- Developed extensive training and education materials to help end users understand the importance of using energy efficient compressed air equipment.

The industry and its customers were on a reliable, consistent path of increased efficiency, increased transparency, and increased understanding before there was any consideration of regulation. This beneficial state has been endangered due to the confusion, misunderstanding, and uncertainty that has resulted from the federal activity related to compressor efficiency. The proposed Amendments to Title 20 related to compressors, unfortunately, compound the confusion and lack of clarity engendered by the federal activity.

We ask that the Commission help the industry and its customers by deferring action on compressors until the situation related to the DOE rules has been resolved. Any action deemed necessary can be pursued in the related Docket No. 2018-AAER-05. Please consider our input, provided below, and help us continue to advance the interests of end users of compressed air systems.

Sincerely,

A handwritten signature in black ink that reads "R. Christopher Johnson". The signature is written in a cursive, flowing style.

R. Christopher Johnson  
Executive Director  
Compressed Air and Gas Institute

## **CAGI Comments on Proposed Inclusion of Compressors, Amendments to Title 20, Sections 1601-1609, California Code of Regulations Docket No. 2018-AAER-10**

### Consistency in Standards

The compressor industry has developed and used standard methods for testing compressors, embodied in the widely accepted ISO 1217 standard, for over 40 years. During the development of the DOE rules for compressor test procedures, we urged the department to adopt the ISO 1217 procedures and to deviate from them as little as possible. This remains our position, and we ask the Commission to assist us in this regard.

It appears the Commission intended to replicate the DOE test procedure rule; however, the proposed amendments to Title 20 contain significant differences from the DOE procedures and from longstanding industry practice that will aggravate an already untenable situation related to the federal activity.

Our biggest concerns relate to the following:

- Alternative Efficiency Determination Methods (AEDMs): DOE included AEDMs in the federal rules in recognition of the fact that manufacturers in this industry offer many specialized models that are built only infrequently. These specialized models are based on standard models, but they have slight modifications demanded by users to make them suitable for different applications or environments, such as corrosive atmospheres, high temperature environments, etc. For these specialized models, and for larger horsepower compressors, which also are often very low volume products, the lack of availability of units for testing and the costs and effort related to testing very low volume products, present great difficulty.

The proposed Amendments to Title 20 do not appear to permit AEDMs for compressors, which will result in an extreme burden on manufacturers. This burden will not increase transparency, enhance efficiency, or increase the availability of data related to efficiency. In fact, the extra testing will provide no benefit whatsoever.

- Definitions: The definitions contained in 10 C.F.R. §431.342 have not been replicated in the proposed Amendments to Title 20. This seems to indicate a significant expansion in the types and classes of compressors that are covered by the Amendment beyond those covered by the DOE rule. After extensive study of the market, of the costs and benefits of regulation, and of possible increases in efficiency, DOE limited the rule to a subset of compressors. The lack of sufficient definitions in the proposed Amendment to Title 20 will make it difficult or impossible to limit the scope of the proposed Amendment rules appropriately. We assume this is an oversight, as testing every compressor and compressor type is not justified economically and will harm the industry and its users.
- Existing Data: DOE noted that it would permit manufacturers to rely on data obtained from testing conducted according to the ISO 1217 standard to meet the requirements of the DOE rule for existing models. The proposed Amendments to Title 20 do not provide similar guidance, which seems to indicate that new tests would be required for all compressor models within a one-year span from adoption of the proposed Amendments. It is highly unlikely that such testing could be completed in such a time frame. In addition, the testing will not provide any benefit to consumers, since it would merely duplicate testing that has already been conducted.