

DOCKETED

Docket Number:	17-AAER-06
Project Title:	Commercial and Industrial Fans & Blowers
TN #:	224827
Document Title:	Johnson Controls Comments: On Commercial and Industrial Fans & Blowers
Description:	N/A
Filer:	System
Organization:	Johnson Controls
Submitter Role:	Public
Submission Date:	9/28/2018 3:41:18 PM
Docketed Date:	9/28/2018

Comment Received From: Johnson Controls
Submitted On: 9/28/2018
Docket Number: 17-AAER-06

On Commercial and Industrial Fans & Blowers

Additional submitted attachment is included below.



September 28, 2018

Submitted via E-Mail:

To: Mr. Alejandro Galdámez
California Energy Commission
Docket Unit, MS-4
Re: Docket No. 17-AAER-06
1516 Ninth Street
Sacramento, California 95814-5512

Re: Johnson Controls Comments - Commercial and Industrial Fans & Blowers [Docket #17-AAER-06]

Mr. Galdámez:

Johnson Controls offers the following comments regarding the California Energy Commission (CEC) proposed rulemaking on Commercial and Industrial Fans and Blowers (Docket # 17-AAER-06).

Johnson Controls is a member of Air-Conditioning, Heating, and Refrigeration Institute (AHRI) and contributed to the proposal they have submitted to this docket. Johnson Controls wishes to express support for the comments offered by AHRI submitted separately. We strongly support AHRI's position that regulating fans embedded in heating, ventilating, and air conditioning (HVAC) equipment is not cost effective, will yield negligible energy savings and will result in unintended negative consequences.

The below comments are meant only to expand upon AHRI's comments.

- Imposing efficiency requirements on products currently regulated by federal appliance efficiency rules will not result in significant additional energy savings and in violation of federal preemption.
- Overall unit efficiency will likely demonstrate minimal changes. If more efficient fan components are required, other components, such as the cabinet or DX coils, will be redesigned to maintain cost competitiveness and consumer affordability.
- Resources, normally available for improving system efficiency and migrating to lower GWP refrigerants, will be redirected for product redesign to accommodate new fans requirements. Resulting products, while continuing to meet efficiency requirements, will yield minimal energy savings but add a significant cost burden to the manufacturer and consumer due to redesign requirements.
- Johnson Controls believes that all regulation of fans using an application-specific metric be done through Title 24 or ASHRAE 90.1.

Johnson Controls embraces energy conservation standards as established by appliance standards and building energy codes and does not take lightly the recommendation that fans embedded in our equipment be exempt from these standards. However, redesigning and re-optimizing HVAC equipment to accommodate embedded fans with prescriptive requirements with minimal real added value is contrary to the spirit of energy efficiency improvement particularly one which will significantly increase the cost of equipment for consumers in California while yielding minimal energy savings. As such, inclusion of these fans as part of the appliance standards for Commercial & Industrial Fans & Blowers runs contrary to CEC's goal of affordable energy efficiency.

Johnson Controls recommends CEC explicitly exclude regulation fans and blowers in embedded in products which must already meet an efficiency rating under DOE Appliance Standards and California Title 20 and Title 24 from the scope of the proposed rule.

As an advocate of energy efficiency and sustainability, JCI further recommends the CEC address the efficiency requirements for non-federally pre-empted products and systems through existing state policy mechanisms such as the proposed rule.

Johnson Controls appreciates the opportunity to comment on proposed rulemaking for commercial and industrial fans and blowers. If you have any questions regarding this submission, please do not hesitate to contact me.

David Stephens Ph.D., P.E., PEM

Director, Global Product Codes & Standards Compliance
(405) 419-6573

David.Stephens@jci.com