

**DOCKETED**

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*Comment Received From: Louis Starr*  
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**NEEA Commercial and Industrial Air Compressor Comments**

*Additional submitted attachment is included below.*

December 31, 2018  
Via Electronic Mail



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Efficiency Division  
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Re: Docket Number 18-AAER-05, Phase 2 Rulemaking Commercial and Industrial Air Compressors

The following comments are submitted for the record of the Commission's 2018 Appliance Efficiency Phase 2 Rulemaking Docket Number 18-AAER-05 regarding Commercial and Industrial Air Compressors. They are submitted on behalf of the Northwest Energy Efficiency Alliance.

The Northwest Energy Efficiency Alliance is a non-profit organization working to encourage the development and adoption of energy-efficient products and services. NEEA is supported by the region's electric utilities, public benefits administrators, state governments, public interest groups and efficiency industry representatives. This unique partnership has helped make the Northwest region a national leader in energy efficiency.

#### *Comments*

#### **Overview**

The Commission is providing national leadership in moving forward to cost effectively capture energy savings for commercial and industrial air compressors for the citizens of California through Title 20 standards. The Department of Energy (DOE) has published a final rule on the test procedure for commercial and industrial air compressors but was not able to publish a final rule for standard levels. The California Energy Commission (CEC) has adopted the same test procedure proposed by DOE that was vetted over a few years with both manufacturers and energy advocates in a fair and transparent process. The CEC test procedure is following the federal requirements which is what the manufacturer will be required to do on a national level once DOE publishes a federal standard in the future. Many of the complaints of DOE's test procedures were addressed, discussed, debated and decided in DOE's regulatory process. Energy advocates and manufactures alike did not get everything they wanted but compromise is the nature of the process and a redo of the process seems unnecessary and unfair. The CEC is adopting the same standard levels for commercial and industrial air compressors that was recommended by DOE. These standard levels offer modest savings and good paybacks to consumers. This is a prudent approach for equipment regulated for the first time. The CEC revised the compliance date to 2022 based upon feedback from manufactures which corresponds to original time table for DOE regulatory requirements to take effect. This too provides a benefit for market leaders that were expecting and planning to provide efficient product to the market in 2022 and deliver regulatory certainty for manufactures along with more efficient product offerings for markets outside of California. In our comments below we provide suggestions for future rulemaking, alternate considerations, and thoughts to furthering the conversation. We applaud the hard work and dedication to establish state standards that provide cost effective energy savings for the consumer.

## 1. Test and List Requirements for Reciprocating Air Compressors

DOE was not able to determine baseline efficiency for reciprocating air compressors and therefore did not set standards. There are currently no standards for reciprocating air compressors data and thus data would not be able to be collected to establish a baseline efficiency in the future. California unlike DOE has a regulatory mechanism of test and list requirements for equipment that could break this cycle. In a follow-on rulemaking, a test list requirement of reciprocating air compressor of a certain scope could be established. The scope of coverage could be reciprocating compressors with large annual duty cycles to justify the energy savings. Market work with trade association in detailing testing reporting and protocol along with some testing of reciprocating air compressors would be valuable. A test list requirement for reciprocating air compressors over 10 hp and that use 3 phase power would be a good starting point. A vast amount of the air compressor shipments is reciprocating air compressors and there is likely a large energy savings opportunity with this class of compressors. Consumers who purchase large reciprocating air compressors should have the choice of efficient air compressors. A test and list requirement will allow market differentiation and provide energy savings to consumers.

## 2. Use of Legacy Data for Compliance

The CEC has adopted a DOE test procedure that uses a DOE approach to sampling procedures and tolerances which are typically the same for most products. The result of the DOE approach often will not allow the use of narrowly defined legacy data developed by industry to demonstrate compliance with the rating. The result of DOE's approach is that existing products must be retested along with new products to the market. This approach makes sense if the rating procedure results in different ratings for legacy products but if it does not, it is not clear the value that is provided in retesting legacy products. New products would be tested to the new test procedure with DOE sampling procedures and tolerances but not narrowly defined industry testing of legacy products thus reducing testing burden. We would suggest CEC review California's ability to adopt a modified DOE test procedure and determine if the resulting ratings are the same for the DOE approach as narrowly defined industry test procedures. If both conditions are true it would be advisable to use narrowly defined industry legacy data to demonstrate compliance with the rating and implement an earlier compliance date (2020) for air compressors by the CEC due to the reduction of retesting. We see value to the market in providing accurate ratings ahead of any compliance data in CEC database in differentiating efficient products not only in California but in other regions that leverage CEC compliance database.

Thank you for considering our comments.



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