

DOCKETED

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Project Title:	Draft 2019 Alternative Calculation Method Reference Manuals and Compliance Software Tools
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**AOS Comments on the 2019 Building Energy Efficiency Standards
Residential and Nonresidential ACM Reference Manuals and Compliance**

Additional submitted attachment is included below.



March 1, 2019

California Energy Commission
Docket Unit, MS-4
Re: Docket No. 19-BSTD-01
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Comments on the 2019 Building Energy Efficiency Standards Residential and Nonresidential ACM Reference Manuals and Compliance Software Updates (19-BSTD-01)

These comments are submitted by the A. O. Smith Corporation (“A. O. Smith”) in response to the California Energy Commission’s proposed revisions to the 2019 Building Energy Efficiency Standards Residential and Nonresidential ACM Reference Manuals and Compliance Software Updates.

A.O. Smith, along with its wholly owned subsidiary, Lochinvar LLC, is North America’s largest manufacturer and seller of residential and commercial water heating equipment, high efficiency residential and commercial boilers, and pool heaters.

In general, A. O. Smith is pleased to work with the California Energy Commission (“CEC”), along with various stakeholders, in developing and commenting on its alternative compliance methodology draft, which will provide an additional compliance option under Title 24, Part 6, when utilizing a heat pump water heater with demand response capabilities in single family and low-rise multifamily housing in the State of California. The proposal will assist manufacturers with product engineering and planning, as well as communicating to interested parties how their heat pump water heaters can meet the requirements of Title 24, Part 6, Section 110.12 (Demand Response). Notwithstanding our general support, A. O. Smith has some questions about the demand response requirements in the draft proposal that if left unclear, will provide ambiguity with regards to compliance in the code.

The proposed alternative calculation manual (“ACM”) for residential water heating requires local control of Time-Of-Use (“TOU”) rates with the ability to update those rates without specifying the details of the pathways to meet the requirements. A. O. Smith seeks clarity from CEC regarding specific compliance pathways to meet the local TOU requirements. More specifically, would an application that is updated through a phone satisfy the alternative calculation method requirements?

Once again, A. O. Smith appreciates the opportunity to provide its comments and stands ready to work with the Commission moving forward.

Sincerely,

A handwritten signature in black ink, appearing to read "Joshua C. Greene". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Joshua C. Greene
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