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Comment Received From: Bruce C. McFee - Sullivan-Palatek, Inc.
Submitted On: 3/11/2019
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Sullivan-Palatek's support for the Atlas Copco letter, March 6, 2019

Additional submitted attachment is included below.

Sullivan Palatek
AIR COMPRESSORS

March 11, 2019

Mr. Drew Bohan
Executive Director
California Energy Commission
1516 Ninth Street
Sacramento, California

Dear Mr. Bohan:

This letter is to confirm our support for Atlas Copco's March 6, 2019, TN # 227285, request that CEC provide a hearing to amend or appeal the rulemaking on compressors.

While CEC has identified in TN # 225912-2, $4 million in savings for the first year and an estimated $49 million annually after full stock turnover from its regulation, we would like to point out that in comparison to the task involved, the savings are not very large. In the Department of Energy regulation, it states that the savings amount to 6/10 of one percent, on page 10 of DOE document listed in TN # 225912-5 "This represents a savings of 0.6 percent relative to the energy use of these products in the no new standards case."

There are likely hundreds of thousands of employees in California whose work is either directly or indirectly affected by compressed air. As a result, we are concerned that the disruption from this regulation could offset the anticipated $4-49 million in annual savings many times over.

Many people consider compressed air as a fourth utility, behind only electricity, water, and natural gas utilities. The applications of compressed air are broad, affecting manufacturing, energy production, food packaging, water treatment, vehicle maintenance, construction and almost anything else that uses mechanical automation. Likewise, the diverse range of compressed air users may include manufacturing plants, hospitals, dairy farms, underground mines, dry cleaners, small repair shops, pharmaceutical laboratories, large office buildings, waste water treatment facilities, outdoor construction sites and many more. The diverse nature of these uses requires many specialized products that cannot be easily regulated in a one size fits all standard.

Some of the specialty variations accommodate operation at high altitudes, cold weather locations, salt issues near the ocean, or for dusty and hazardous conditions. Each condition requires a different design. We expect that with the regulation it could become especially difficult to find higher pressure compressors when customers need 150, 175 or 200 psi for their application.

In document TN #226168 ….Atlas Copco industry expert David Prator stated "I estimate that even if compliance certification problems discussed below are resolved, that the number of

rotary air compressor models offered for sale in California will drop by about one quarter if the proposed efficiency level – TSL 2 - is adopted on the time line proposed by the Commission."

A second problem that needs to be addressed is that the DOE rule changed a long standing industry test standard. Despite that the DOE rule expressed intent to closely mirror ISO-1217, it itemized numerous modifications listed on pages 106 to 170 of the final rule of the test procedure (https://www.energy.gov/sites/prod/files/2016/12/f34/Compressors%20TP_FR_12-1-16_Final%20Issuance%20CLN%20v2.pdf).

The compressed air industry, in coordination with the Compressed Air and Gas Institute (CAGI), had previously developed a Performance Verification Program so that members could validate that their numbers were consistent with the program. The industry spent years fine tuning the testing and working out inconsistencies. The program utilized a third party facility currently at (Intertek, Plano TX) to independently test manufacturer's equipment. This laboratory became known as the one official test facility that could be relied upon to accurately measure compressor performance. It became a model where manufacturers could duplicate their own internal test equipment and procedures to come up with a common result. By changing the test procedure, manufacturers no longer have any authorized test facility known to produce the results required by CEC.

These changes have created confusion and disruption to the industry's progress in energy efficiency improvement and measurement. Indeed, the industry through CAGI has already requested clarification of some of the most confusing statements, yet received no answer from the DOE. As a result the same level of confusion continues with the CEC rule. In the event that CEC is unable to provide this clarification quickly and validate an official independent test center quickly, we believe the withdrawal of models from California will be much higher than the 25% estimated by David Prator.

Sincerely,

Bruce C. McFee
Chairman, CEO Sullivan-Palatek, Inc.
President, Saylor-Beall Manufacturing Company