

DOCKETED

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Project Title:	Residential Alternative Calculation Method Variable Capacity Heat Pump Modeling Approach
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Samsung Comments - VCHP Compliance Option Staff Report

Additional submitted attachment is included below.



California Energy Commission
Docket Unit, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Staff Report on the Variable Capacity Heat Pump Performance Compliance Option (Docket No. 19-BSTD-02)

Honorable Commissioners and Staff

Samsung HVAC is a manufacturer of Variable-speed Mini-splits and Multi-splits (VSMS) and Variable Refrigerant Flow (VRF) heating and cooling systems. We appreciate the opportunity to submit comments in response to information presented in the Staff Report on Variable Capacity Heat Pump Performance Compliance Option¹.

We applaud the Commissions efforts to give credit to energy efficient Variable Capacity Heat Pumps (VCHP). However, we like to draw your attention to the requirement for wall mounted thermostats in zones greater than 150 ft². The staff report assumes that all VCHP's operate with a thermostat. Samsung has VCHP's that can operate without a wall mounted thermostat, these units have temperature sensors in the return air stream. Optional external temperature sensors install inside the cooling space usually mounted on the wall and connect with wires to the indoor unit for remote sensing. A mobile app is available for most models to remotely control the system operation as a thermostat would do. Such technology is not unique to Samsung and there may be other products in the market with similar functionality. We believe the intention of the staff report is not to exclude such systems but require that the controls operate with temperature sensor/s for controlling the unit is located inside the conditioned room.

Hence, we request the language to be changed such that the control can be accomplished with a thermostat or a remote app if the control system senses the temperature inside the conditioned room with all the temperature sensing elements located inside the conditioned space.

Please contact me if you have further questions. We will be happy to work with CEC to develop regulations that is fair to all concerned stakeholders.

Best Regards

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¹ Miller, Jeff, Bruce Wilcox, Abram Conant. 2019. "Variable Capacity Heat Pump Performance Compliance Option." California Energy Commission. CEC-400-2019-012