

DOCKETED	
Docket Number:	19-BSTD-03
Project Title:	2022 Energy Code Pre-Rulemaking
TN #:	235183
Document Title:	Sushil Kumar Comments - 2022 Energy Code Computer Rooms, Compressed Air Systems, and Refrigeration
Description:	N/A
Filer:	System
Organization:	Sushil Kumar
Submitter Role:	Public
Submission Date:	10/9/2020 11:20:53 AM
Docketed Date:	10/9/2020

Comment Received From: Sushil Kumar
Submitted On: 10/9/2020
Docket Number: 19-BSTD-03

2022 Energy Code Computer Rooms, Compressed Air Systems, and Refrigeration

I have the following technical concerns with the CASE Report on Nonresidential Computer Room Efficiency. First, air economizers have a 10°F increase in economizer temperature while all other technologies have a 25°F increase. Standard redundancy, structural, and system design considerations may be challenging to uphold and also meet the new requirements. Secondly, if evaporatively-cooled technology needs to be applied to meet these requirements where a basic "dry" system would have been able to be applied, water consumption will go from zero to millions of gallons per year in some cases. And finally, all of the analysis assumes 100% of the economization hours are available for an airside economizer. Unfortunately in California unsatisfactory environmental factors exist such as ocean saltwater spray, smog, and most recently smoke from fires which would decrease the hours airside economization would be viable for a data center or computer room that requires clean air for sensitive servers. Please consider these comments during your evaluation of the CASE proposal. Thank you.

Sushil Kumar, PE, LEED AP+, CxA, CEM
EXP | Senior Project Manager
t : +1.312.616.7479 | m : +1.312.446.3327 | e : Sushil.Kumar@exp.com
205 North Michigan Avenue
Suite 3600
Chicago, IL 60601
USA