

**DOCKETED**

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*Comment Received From: A. O. Smith Corporation*  
*Submitted On: 10/23/2020*  
*Docket Number: 19-BSTD-03*

**2022 Energy Code Pre-Rulemaking - Proposed 2022 Energy Code  
Multifamily Domestic Hot Water Boilers and Restructuring**

*Additional submitted attachment is included below.*



October 23, 2020

Commissioner J. Andrew McAllister, Ph.D.  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

**Re: 2022 Energy Code Pre-Rulemaking - Proposed 2022 Energy Code Multifamily Domestic Hot Water Boilers and Restructuring**

Dear Commissioner McAllister and CEC Staff:

A. O. Smith Corporation (“A.O. Smith”) appreciates the opportunity to provide comments on the proposed updates to multifamily domestic hot water boilers for the Title 24 2022 Building Code. A. O. Smith understands the role high efficiency boilers and high capacity service water heating systems can play in building efficiency. A. O. Smith was pleased to see the refinements made by the CASE team and carried through in CEC’s proposal in response to A. O. Smith’s initial comments on the draft 2022 Title 24 Case Report. Overall, A. O. Smith supports the proposals for hot water boilers, as proposed, especially the exception to the oxygen requirement for boilers above 5 million Btu/h or greater capacity if they have a full-load combustion efficiency of 90 percent. Oxygen trim control is only one method of improving operating efficiency of boilers. A boiler with active oxygen control is not inherently more efficient than one without such a control. As CEC rightfully acknowledged with its proposal, incenting condensing technology by allowing an exception to the oxygen trim control requirement will also save energy and emissions further aligning with CEC’s policy goals. A. O. Smith does suggest that CEC clarify that the combustion and thermal efficiencies referenced for the exclusion and/or requirements for hot water boilers are those that are measured pursuant to the DOE test procedure in 10 CFR Part 431.86. In conclusion, A.O. Smith appreciates the opportunity to provide comments on the draft proposals relating to multifamily domestic hot water boilers. A.O. Smith encourages the Commission to adopt these provisions, as proposed, without further modification for the 2022 T24 building code. Once again, A. O. Smith stands ready to work with the Commission moving forward.

Respectfully submitted,

A handwritten signature in black ink that reads "Ashley A. Armstrong".

Ashley A. Armstrong  
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