

<b>DOCKETED</b>	
<b>Docket Number:</b>	19-BSTD-03
<b>Project Title:</b>	2022 Energy Code Pre-Rulemaking
<b>TN #:</b>	235798
<b>Document Title:</b>	Munters Corporation Comments - Response to Comment TN235637
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Munters Corporation
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	11/24/2020 11:00:52 AM
<b>Docketed Date:</b>	11/24/2020

*Comment Received From: Munters Corporation  
Submitted On: 11/24/2020  
Docket Number: 19-BSTD-03*

**Response to Comment TN235637**

*Additional submitted attachment is included below.*



11/24/20

In Regards To -

Docket Number: 19-BSTD-03

Project Title: 2022 Energy Code Pre-Rulemaking

TN #: 235637

Document Title: *Vertiv Comments – Vertiv Response to TN235126 – Addressing Concerns with Integrated Pumped Refrigerant Proposal*

Submission Date: 11/17/20

To: Haile Bucaneg and Ronald Balneg, California Energy Commission

From: Jim Marsh, Munters Data Centers

### **Munters Response to TN235637**

Vertiv quotes Munters comment TN235126 without the qualifier that “Vertiv/Emerson Liebert DSE Free-Cooling Economization *split-system* with integrated pumped refrigerant economizer appears to be a proprietary product.”

There is no argument against the use of “Integrated” and likewise no argument for favoring one manufacturer.

While there was another manufacturer of a packaged air handler with pumped refrigerant economizer recognized at the time of Munters comment and as mentioned by Vertiv in their response, the qualifier for the proprietary nature of Vertiv’s technology was stated: “*in split system perimeter computer room air conditioner (CRAC).*”

This defines a traditional air-cooled split CRAC system including an indoor evaporator section and outdoor condensing section with the addition of a method to divert refrigerant from compression to pumping during economizer mode.

Unless it is shown where another comparable split system pumped refrigerant economizer is available in the computer room cooling market today, we hold that the statement as quoted is valid.

### **Munters Corporation**

225 S. Magnolia Avenue, Buena Vista, VA 24416 USA Phone: +1 540 291 1111. FAX +1 540 291 2222  
[datacenters@munters.com](mailto:datacenters@munters.com) [www.munters.us/datacenters](http://www.munters.us/datacenters)