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Response to Comment TN235639

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 #: 235639

Document Title: *Vertiv Comments – Vertiv Response to TN235095 – Disagree with Elimination of Economizer Types for Computer Rooms*

Submission Date: 11/17/20

To: Haile Bucaneg and Ronald Balneg, California Energy Commission

From: Jim Marsh, Munters Data Centers

Munters Response to TN2356379

The document title and text suggests that Munters comment TN235095 called for the elimination of economizer types for computer rooms. This is not the case. Currently there are only two economizer definitions in the 2019 Building Energy Efficiency Standards, Title 24, Part 6, not specific to computer rooms: “Economizer, Air” and “Economizer, Water”. These two broad categories do not capture the specific nature of many economizer type variations applied to computer rooms over the past decade.

In fact, our earlier comment TN235021 on which the presented list was based lobbied for the inclusion of all computer room economizer type definitions to better understand the applicability of all specific economizer variations including evaporative components, to current and future code language. The strikethrough of the three types in TN235095 were an illustration of the practical and relative limitations of those particular systems to perform under the proposed 2022 full economizer threshold values, based on industry acknowledged performance of the applicable technologies.

Munters Corporation

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