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AMCA International comments on Draft 2022 Energy Code Pre-Rulemaking Express Terms

Additional submitted attachment is included below.

AMCA International
Air Movement and Control Association International, Inc.
The International Authority on Air System Components Since 1917

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To: California Energy Commission (CEC) staff via submission on CEC's Web page at https://efiling.energy.ca.gov/EComment/EComment.aspx?docketnumber=19-BSTD-03

From: Air Movement and Control Association (AMCA) International

RE: Draft 2022 Energy Code Pre-Rulemaking Express Terms / Docket # 19-BSTD-03 / Docketed Date 2/22/2021

Dear CEC staff:

AMCA International thanks the California Energy Commission for the opportunity to comment on the Draft 2022 Energy Code Pre-Rulemaking Express Terms.

Founded in 1917, AMCA International is a not-for-profit association of manufacturers of fans, dampers, louvers, air curtains, airflow-measurement devices, ducts, acoustic attenuators, impellers, and other air-system components for commercial-building heating, ventilating, and air-conditioning; industrial-process; and power-generation applications. Its mission is to advance the knowledge of air systems and uphold industry integrity on behalf of its nearly 400 members worldwide.

AMCA International has been leading the development and refinement of energy-efficiency codes, standards, and regulations for commercial and industrial fans for more than a decade, working proactively and collaboratively with the U.S. Department of Energy (DOE), ASHRAE, the International Code Council, the California Energy Commission, the International Association of Plumbing and Mechanical Officials (IAPMO), several states, a number of energy-efficiency advocacy organizations, the European Commission, and the International Organization for Standardization (ISO).

AMCA International is pleased that many of its comments regarding Air Distribution Draft CASE Report 2022-NR-HVAC2-D submitted on August 14, 2020, were accepted by the CASE team and are reflected in the Draft 2022 Energy Code Pre-Rulemaking Express Terms.

With this background on AMCA International as context, please accept the following comments in the spirit of collaboration:

1. The version of ANSI/AMCA Standard 500-D, *Laboratory Methods of Testing Dampers for Rating*, referenced in the Draft 2022 Energy Code Pre-Rulemaking Express Terms is the 2012 version. AMCA International requests that the 2018 version of the standard be

referenced instead. A copy of the 2018 version of ANSI/AMCA Standard 500-D can be provided to CEC staff, if that would be helpful in consideration of this comment.

ANSI/AMCA Standard 500-D-18, aside from being current, is referenced in ANSI/ASHRAE/IES 90.1-2019, *Energy Standard for Buildings Except Low-Rise Residential Buildings*, and the 2021 International Energy Conservation Code (IECC). Improvements made with the 2018 edition of ANSI/AMCA Standard 500-D include more consistency with ANSI/ASHRAE Standard 120-2017, *Method of Testing to Determine Flow Resistance of HVAC Ducts and Fittings*, regarding airflow-measurement setups, increased clarity and flexibility of certain test setups, and more concise language.

AMCA International believes this update would make the 2022 California Energy Code more consistent with other new codes and standards.

2. AMCA International standards and an ISO standard referenced in the Draft 2022 Energy Code Pre-Rulemaking Express Terms are missing from Appendix 1-A (Standards and Documents Referenced in the Energy Code). AMCA International requests that the following referenced standards be placed in this appendix alongside other industry consensus-developed standards:

    i. ANSI/AMCA Standard 208-18, *Calculation of the Fan Energy Index*
    ii. ANSI/AMCA Standard 210-16/ASHRAE Standard 51-16, *Laboratory Methods of Testing Fans for Certified Aerodynamic Performance Rating*
    iii. ANSI/AMCA Standard 500-D-12 (or -18, if the first comment is accepted)
    iv. ISO 5801-2017, *Fans — Performance testing using standardized airways*

If you have questions, please do not hesitate to contact me. Again, AMCA International thanks the California Energy Commission for the opportunity to comment.

Respectfully,

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