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CO2 Measurements

Petition for change of CO2 PPM measurements in Demand Controlled Ventilation (DCV) systems.

CA Title 24, Section 120.1 4.F

"CO2 sensors shall be certified by the manufacturer to be accurate within plus or minus 75 ppm at a 600

and 1000 ppm concentration when measured at sea level and 25°C, factory calibrated, and certified by

the manufacturer to require calibration no more frequently than once every 5 years. Upon detection of

sensor failure, the system shall provide a signal which resets to supply the minimum quantity of outside

air to levels required by Section 120.1(c)3 to the zone serviced by the sensor at all times that the zone is occupied."

What is the basis for the precision of the sensor? The difference in impacts to human life, health and viral spread are arbitrary between 75-100ppm. The requirement for this level of precision restricts competition and unfairly impacts customers in the State of California. These impacts include higher costs, restriction of suppliers and increased lead times. By allowing for multiple technologies and a wider range of precision, the State and it's residents will ultimately benefit.

We would like to propose a change to this section of CO2 measurement precision requirements in the form of an increased PPM value (75 to 100PPM) or the addition of a percentage error of total measured value to this figure.

By allowing for an increased, but still restricted, measure of error the State will benefit from lower costs without a decrease in human health and meeting the intent of the specifications.