

**DOCKETED**

|                         |                                                              |
|-------------------------|--------------------------------------------------------------|
| <b>Docket Number:</b>   | 21-BSTD-01                                                   |
| <b>Project Title:</b>   | 2022 Energy Code Update Rulemaking                           |
| <b>TN #:</b>            | 238860                                                       |
| <b>Document Title:</b>  | Unico, Inc. Comments - Single Family Heat Pump Documentation |
| <b>Description:</b>     | N/A                                                          |
| <b>Filer:</b>           | System                                                       |
| <b>Organization:</b>    | Unico, Inc.                                                  |
| <b>Submitter Role:</b>  | Public                                                       |
| <b>Submission Date:</b> | 7/14/2021 11:46:13 AM                                        |
| <b>Docketed Date:</b>   | 7/14/2021                                                    |

*Comment Received From: Unico, Inc.*  
*Submitted On: 7/14/2021*  
*Docket Number: 21-BSTD-01*

## **Single Family Heat Pump Documentation**

Table 7 of the Single Family Heat Pump Documentation omitted other classes of products. Specifically it omitted small duct high velocity products (SDHV). These products are included in the market survey shown in Table 8 so it appears to be an oversight.

Please correct table 7 to avoid confusion with California users who might believe that SDHV systems are prohibited because the SDHV SEER value is less than 14. SDHV systems are tested under different conditions so the SEER values are not derived the same way.

It might be easier to just reference or copy the Federal rule, 10 CFR 432(c).

Furthermore, Table 8 average efficiency columns are much higher than the data in the AHRI directory and appear to be the maximum technically feasible value. Changing the column heading to "Max Tech" would clarify the information, particularly for small duct systems.

Best regards,

Craig Messmer  
V.P. Engineering  
Unico, Inc.