DOCKETED	
Docket Number:	21-BSTD-01
Project Title:	2022 Energy Code Update Rulemaking
TN #:	239007
Document Title:	Taylor Engineering Comments - Revise 1201(c)1 filtration requirements
Description:	N/A
Filer:	System
Organization:	Taylor Engineering
Submitter Role:	Public
Submission Date:	7/26/2021 3:26:08 PM
Docketed Date:	7/26/2021

Comment Received From: Taylor Engineering
Submitted On: 7/26/2021
Docket Number: 21-BSTD-01

Revise 1201(c)1 filtration requirements

See attached letter

Additional submitted attachment is included below.

TAYLOR ENGINEERING

July 26, 2021

To: California Energy Commission
Subject: Title 24 Part 6 15-day language - Section 120.1(c)1.

On behalf of Taylor Engineering, I am submitting these comments on Section 120.1(c)1.:

1. Wherever "MERV" is referenced, it should be changed to "MERV-A", i.e. require filters to be tested after being preconditioned using ASHRAE 52.2 Appendix J. There are many filters on the market, especially the inexpensive 1" and 2" filters, that meet MERV 13 by creating a static charge on the media that causes an "initial" efficiency of MERV 13, but the charge readily dissipates and performance typically falls well below MERV 11. This is a significant loophole in the ASHRAE 52.2 method of test that was resolved by the addition of Appendix J. However, that appendix is optional; uses must specify that they require the preconditioning procedure to ensure they are getting the desired performance. The term "MERV-A" should be added to the definition section as the Minimum Efficiency Reporting Value when the filter is tested in accordance with ASHRAE 52.2 including Appendix J.
2. Item C.i. should say "Filters with a nominal depth of 2 inches or more." Certainly there is no intent to outlaw deeper filters. As worded, high efficiency 3- and 4-inch filters and all bag and cartridge filters could not be used.

Thank you for considering these comments.

Sincerely,
Taylor Engineering

Steven T. Taylor, P.E.
Principal