

DOCKETED

Docket Number:	20-AAER-02
Project Title:	Air Filters
TN #:	245906
Document Title:	Stator LLC Comments - Clarification Request for Express Terms
Description:	N/A
Filer:	System
Organization:	Stator LLC
Submitter Role:	Public
Submission Date:	9/8/2022 5:25:05 AM
Docketed Date:	9/8/2022

*Comment Received From: Stator LLC
Submitted On: 9/8/2022
Docket Number: 20-AAER-02*

Clarification Request for Express Terms

Additional submitted attachment is included below.

8 September 2022

California Energy Commission
Docket Unit
Docket No.20-AAER-02
715 P Street, MS-4
Sacramento, CA 95814

Re: Docket No. 20-AAER-02

Dear CEC Staff,

To address formatting errors associated with the on-line comment submission form, please accept the following resubmitted and expanded clarification requests.

1. Labeling of filter packaging: Many retailers / distributors buy a master pack of 10, 20 or more filters. Each of these filters are individually packaged and identified then put into a big brown box with limited information (usually just the part's type, filter number, and quantity). Would this master pack box need to be identified as per CEC's proposed requirement (i.e., using info from Table Z-1 or Z-2), provided that each filter inside would be individually packaged and would include such information on its individual packaging?
2. Laboratory qualifications: The express terms require filters to be tested in accordance with AHRI 680 or ASHRAE 52.2. Please clarify what, if any, criteria exist for a laboratory to conduct tests in accordance with these standards. For example, are manufacturers permitted to test in their own labs? If laboratory accreditation is required, what are the criteria for accreditation (e.g., are laboratories that are approved by an ISO 17065 accredited certification body approved by CEC to conduct these tests)?
3. Scope of air filter definition: Are air filters serving unitary residential supply ventilation fans or unitary residential heat or energy recovery ventilators included within the scope of the definition as shown below? The express terms' definition of air filter applies to "residential ducted forced-air ventilation, heating or cooling systems." Would "forced-air" systems include unitary residential supply ventilation fans or unitary residential heat or energy recovery ventilators? Following are links included for context and reference:
 - a. An example of a unitary residential supply ventilation fan: <https://www.broan-nutone.com/enus/product/freshairsystems/fin-180b-hw>.
 - b. Examples of unitary residential heat or energy recovery ventilators: <https://www.broan-nutone.com/enus/fresh-air-systems/residential>.

Thank you in advance for the answers to these questions, which will likely lead to further comments.

Sincerely,



Mike Moore
Stator LLC