

DOCKETED	
Docket Number:	20-AAER-02
Project Title:	Air Filters
TN #:	246010
Document Title:	CEC Air Filter Rulemaking - GEA Comments
Description:	N/A
Filer:	John Schlafer
Organization:	GE Appliances
Submitter Role:	Public
Submission Date:	9/13/2022 1:18:57 PM
Docketed Date:	9/13/2022



GE APPLIANCES
a Haier company

John T. Schlafer
Senior Counsel, Regulatory Affairs

Appliance Park - AP2-225
Louisville, KY 40225

T: (502) 452-7603
F: (502) 452-0347
john.schlafer@geappliances.com

September 13, 2022

Via efilings.energy.ca.gov (Docket No. 20-AAER-02)

California Energy Commission
Docket Unit, MS-4
Re: Docket No. 20-AAER-02
715 P Street
Sacramento, California 95814-5512

Re: Title 20 Notice of Proposed Action for Air Filters Regulation – Appliance Efficiency Rulemaking for Air Filters; Docket No. 20-AAER-02

Dear Chair Hochschild:

GE Appliances, a Haier company, ("GEA") respectfully submits the following comments to the California Energy Commission ("CEC" or the "Commission") in response to the Commission's Title 20 Notice of Proposed Action for Air Filters Regulation; Docket Number 20-AAER-02

GEA is a leading US manufacturer and distributor of home appliances and space conditioning products, including a full line of variable refrigerant flow, multi-split, and mini-split systems, as well as single package vertical units and packaged terminal air conditioners, room and portable air conditioners, and residential ducted heating and cooling solutions. GEA has been a participant in and contributor to the CEC's appliance regulatory processes since their founding.

GEA appreciates the work of CEC on this rulemaking and its collaboration with and responsiveness to the concerns of industry stakeholders. GEA has a single requested revision to the proposed regulations. This revision relates to a specific use case that it does not appear the proposed regulations are intended to cover but to which the regulations, as drafted may be interpreted to apply.

GEA is a brand owner and distributor of a line of mini-split and multi-split ducted residential heating and cooling systems. The indoor units for these systems contain a basic plastic mesh screen, which is referred to as an air filter in product literature. Unlike a traditional air filter, however, which is designed to remove particulate matter from the air to the benefit of the occupants of the conditioned space, these plastic mesh screens are intended to protect the components of the split-system indoor units from

debris when no air filter is otherwise installed by the user. While the screens do remove some debris from the air, the screens do not function as the proposed regulation contemplates for traditional air filters and no MERV rating or other effectiveness information is communicated to consumers. The screens are removeable, washable, and reusable. The screens are not generally available at retail, but they may sometimes be purchased as replacement parts like many components of the systems with which they are sold. The screens do not come in standard sizes. Rather, they are design as components for specific models only. In addition, they are not sold independent of their associated models.

Because the screens described above are designed for a different purpose than the air filters it appears are intended to be covered by the proposed regulation, GEA requests that the language of the proposed regulation be revised to unambiguously exclude them. To that end, GEA proposes the below amendments to the proposed definitions.

“Air filter” means a disposable or reusable air-cleaning device with air filtering media encased in a frame of a nominal depth of no greater than 6.0 inches used for removing particulate matter from the air and designed for installation in residential ducted forced-air ventilation, heating or cooling systems.

(1) Air filter does not include:

- (A) Electronic air cleaners;
- (B) Filter media sold as rolls, i.e. not encased in a frame;
- (C) Air filters designed and sold exclusively for installation in products other than residential ducted forced-air systems;
- (D) Single-layer plastic mesh screens sold as components of equipment.

GEA appreciates the opportunity to provide these comments. Please do not hesitate to contact me with any questions or concerns.

Very truly yours,



John T. Schlafer