DOCKETED	
Docket Number:	22-AAER-01
Project Title:	Commercial and Industrial Fans and Blowers
TN #:	248444
Document Title:	Response to Comments 2nd 15-day comment period
Description:	Responses to comments received during the 2nd 15-day public comment period.
Filer:	Alex Galdamez
Organization:	California Energy Commission
Submitter Role:	Commission Staff
Submission Date:	1/19/2023 1:29:46 PM
Docketed Date:	1/19/2023

2nd 15-day Written Comments Received
Commercial and Industrial Fans and Blowers
Title 20, Sections 1802, 1860 through 1870

September 7, 2022, through September 22, 2022

Commenter(s) Name(s)	Comment type	Organization	Assigned number
Rad Ganesh	Written Comment	Rad Ganesh	1
AMCA	Written Comment	AMCA	2
AHRI	Written Comment	AHRI	3

Commenter Number and Comment number	Comments/ Suggested Revisions	Response
1	Sec 1604, 2. AMCA 214 - 21 is a Test Procedure for calculating FEI. The docket # 22- AAER-01 does not identify any tolerances on surveillance tests of published performance ratings for a manufactured product like fans. AMCA publication 211-22 'CRP Product Rating Manual for Fan Air Performance' has withstood the test of time in the fan industry in the practical establishment of these test tolerances and should be seriously considered for surveillance tests. AMCA CRP (Certified Ratings Program) has worldwide acceptance	Comment acknowledged. CEC staff has concluded that the purpose of AMCA 211-22 is for AMCA's fan re-certification program by conducting a check-test for the CIFB. Because of the scope of AMCA 211-22 and ISO-13348 and because the tolerances of both would loosen the duty points for certification, CEC staff has decided to not include AMCA 211-22 nor ISO-13348:2007 as part of the proposed regulation because it would not effectively achieve the goals of the rulemaking. Thus, no changes to the proposed regulations are necessary.

2	On behalf of Air Movement and Control Association International (AMCA)1, we simply want to thank the California Energy Commission, and notably Alejandro Galdamez, PE, of the CEC Appliances Office – Efficiency Division, for the work on this commercial and industrial fans and blowers rulemaking, including his efforts in contributing to development of ANSI/AMCA Standard 214-2021, *Test Procedure for Calculating Fan Energy Index (FEI) for Commercial and Industrial Fans and Blowers*. AMCA has worked to collaborate with the CEC, U.S. Department of Energy, and other stakeholders in fan efficiency rulemakings that are fair, effective, and enforceable for manufacturers, while also driving towards energy savings, since discussions of fan regulations began around 2011. AMCA wishes to express its appreciation for CEC in its continued collaboration in the last stages of this rulemaking.	Staff acknowledges and provides thanks for the supporting comments.
3	On behalf of the Air Conditioning, Heating and Refrigeration Institute[1] (AHRI), we wish to express our appreciation to the California Energy Commission, and especially Alejandro Galdamez, PE, of the CEC Appliances Office – Efficiency Division, for the work on the commercial and industrial fans and blowers rulemaking, as well as his efforts to develop the ANSI/AMCA Standard 214-2021, Test Procedure for Calculating Fan Energy Index (FEI) for Commercial and Industrial Fans and Blowers. AHRI appreciates the extensive stakeholder outreach by CEC to work with U.S. Department of Energy, and others developing the fan efficiency rulemakings that are practical, effective, and enforceable for manufacturers, while also increasing energy savings.	Staff acknowledges and provides thanks for the supporting comments.