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*Comment Received From: Craig Silvey
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Response to Proposed School and Office System Requirements for 2025

The proposed requirements for school and office multizone systems 140.4(a)3 seem way to specific and limiting and it is questionable how these are the most energy efficient or cost-effective solutions.

For schools, how would the cost of providing individual economizers for every classroom fan coil be more efficient than a single, central economizer at a central AHU such as in a VAV system? What about the maintenance burden of distributed systems as opposed to centralized? What if the owner can't afford the cost of a CHW system and instead prefers DX? What if the owner had a geothermal loop and wanted a water-to-water heat pump in lieu of air-to-water?

For offices, similar concerns of pigeon-holing designers to fan coils in lieu of centralized systems, and air-to-water vs water-to-water HP options. As for DCV, isn't that covered in the mandatory requirements? Does a requirement for airside heat recovery payback considering offices have low minimum ventilation requirements as compared to say a laboratory building? Thank your for your consideration.