

**DOCKETED**

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*Comment Received From: QC Manufacturing  
Submitted On: 5/22/2024  
Docket Number: 24-BSTD-01*

## **Proposed Changes to Whole House Fans on CBECC-Res Multifamily**

*Additional submitted attachment is included below.*



QC Manufacturing Inc. 26040 Ynez Road Temecula, CA 92591

May 9,2024

California Energy Commission  
Docket Unit, MS-4  
1516 Ninth Street  
Sacramento, CA 95814-5512

**Docket 24-BSTD-01**

Submitted by: Dane Stevenson

QC Manufacturing, Inc.

We, at QC Manufacturing, Inc., submit this comment to express our opposition to the proposed removal of whole house fan (WHF) modeling inputs and Home Energy Rating System (HERS) verification inputs from the California Building Energy Code Compliance Software for Residential Buildings (CBECC-Res).

The feature allowing WHF modeling has remained unused for several years and has not been implemented for multifamily models and has been deemed unnecessary and never used. However, it is imperative to note that significant developments have occurred since its inception.

In 2019, a meeting took place between representatives from CA Energy commission, Mazi Shiraz, Todd Ferris, Larry Froes, and QC Manufacturing engineering team. During this meeting, most of the discussion involved creation of the WHF HERS verification for 2019 code. However, the potential for WHF modeling in multifamily structures was also discussed. At the time, WHF modeling was disabled due to the absence of certified products for stacked units without attics listed on the Title 20 appliance database.

Consequently, the WHF modeling capability in CBECC-Res remained inactive, and we were told that in order to activate the modelling feature, products needed to be created first on the Title 20 appliance database that met the criteria for a multi-family WHF

Since then, QC Manufacturing has been diligently developing a multifamily whole house fan that requires no attic and directly vents to the outside. This product is nearing certification on the Title 20



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appliance database registry after a three-year development period. Our intention upon certification was to request the activation of WHF modeling within CBECC-Res for multifamily modeling purposes.

However, the proposed removal of WHF modeling inputs, as outlined in Appendix C of the case report (TN255231), jeopardizes our efforts. The elimination of these inputs, intended to simplify the code base, aligns with inputs crucial for our forthcoming WHF modeling requests.

Moreover, the inputs essential for HERS verification coincide with those required for WHF modeling. We anticipate requesting the activation of these inputs for the 2025 code.

In conclusion, we urge the California Energy Commission to reconsider the removal of WHF modeling inputs and HERS verification inputs from CBECC-Res. These inputs are fundamental for our project and future endeavors within the multifamily housing sector.

Thank you for considering our input.

Sincerely,

Dane Stevenson

QC Manufacturing, Inc.