

*Comment Received From: Baltimore Aircoil Company
Submitted On: 6/27/2024
Docket Number: 24-BSTD-01*

CA Title 24 proposal - BAC comments 15-Day 6-28-24

Additional submitted attachment is included below.



June 28, 2024

CEC Docket 24-BSTD-01
2025 Building Energy Efficiency Standards

Dear CEC Staff,

Baltimore Aircoil Company (BAC) is pleased to submit comments on the 15-Day Language to supplement our comments previously sent on November 17, 2023, September 5, 2023, July 28, 2023, and May 7, 2024, along with our response to the Final CASE Report dated August 2023 and the Pre-Rulemaking Workshop held on August 23, 2023.

Our comments on the cooling tower-related changes for 2025 are as follows:

- Cooling Tower Efficiency:
 - As mentioned in our previous comments on the 45-Day language, we are disappointed in the 33% increase in minimum efficiency for axial fan, open-circuit cooling towers used in chiller plants over 300 tons in certain climate zones, particularly as no other class of HVAC equipment is being challenged to this degree for the 2025 Edition. However, we do appreciate the reduction in the required minimum efficiency, as compared to what was originally proposed in the CASE Report, in response to stakeholder comments, including those from BAC.

- Blowdown Controls:
 - We are supportive of the final blowdown control requirements, helping ensure water use from cooling towers is minimized, which is a primary goal of all water treatment programs.

We look forward to working with the CEC in the future and welcome agency officials to visit our manufacturing facility in Madera, California, to showcase BAC's sustainable cooling technologies. Please contact us to arrange a visit and see firsthand the heat rejection and thermal storage equipment we manufacture in California for both the U.S. and export markets.

Sincerely,

Bill McQuade, P.E., LEED® AP, FASHRAE
Vice President of Government Affairs and Sustainability

CC: Mike Nerozzi, Director of State Government Affairs
Benjamin Cohen, Manager, Product Marketing - North America