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Carrier Corporation comments to the 2025 T24 energy code 15 day language

Additional submitted attachment is included below.



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June 27th, 2024

California Energy Commission (CEC)
Docket Unit, MS-4
1516 Ninth Street
Sacramento, California 95814-5512

Docket Number: 24-BSTD-01

RE: Carrier comments to the 2025 Energy Code Rulemaking, Title 24 Express terms, 15-day language.

Dear CEC Staff,

Carrier Global Corporation (Carrier) provides fire safety, security, building automation, heating, ventilation, air conditioning, and refrigeration systems and services to promote integrated, high-performance buildings that are safer, smarter, and more sustainable. Carrier is the founder of the modern HVAC industry and operates across the globe. Our range of products includes unitary residential and commercial products, including ducted and ductless, transport refrigeration products, chillers, and HVAC building services.

Carrier appreciates the opportunity to comment on the proposed 15-day language of the 2025 Title 24 Energy Code Rulemaking. Carrier would like to thank the CEC staff for the opportunity to provide comments on the 45-day language of this rule and the apparent review of those comments submitted. A number of the issues identified in the comments to the 45-day language were addressed, but Carrier feels there are continued concerns with the 15-day language. Those issues are addressed below.

Section 110.2(a) – Minimum Efficiency Tables

Carrier understands that the CEC intends to keep the proposed approach from the 45-day language for the efficiency tables of administering the specific metrics that are required by Title 24 and differentiating those required by a federal energy conservation standard. However, there are inconsistencies that exist in the table as proposed relating to categorization of these metrics.

Specific comments to the minimum efficiency tables to increase consistency and accuracy:

Table 110.2-A Air Conditioners and Condensing units: CEC has once again labeled the IEER for Condensing Units as a “Federal Minimum.” DOE does not have an Energy Conservation Standard for standalone commercial condensing units and does not reference AHRI 365 as a test procedure. Carrier proposes that these values should be aligned with ASHRAE 90.1.

Table 110.2-B Heat Pumps, Minimum Efficiency Requirements



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CEC has prescribed a 3.2 COP requirement for Split System and Single Packaged heat pumps with a capacity $\geq 240,000$ Btu/h and $< 760,000$ Btu/h. COP at 47°F is a federally controlled metric for a heat pump with this capacity. Carrier recommends modifying to show a federal minimum to stay consistent with the rest of the table.

Tables 110.2-F and G: VRF Minimum Efficiency Requirements

In the case of VRF equipment $< 65,000$ Btu/h, CEC has prescribed minimum efficiency requirements for all types. These metrics are federally controlled, and Carrier feels that it adds undue complexity to continue to have the separate metrics for before 1/1/2023 and after 1/1/2023.

Section 140.4(a)3: Multizone Space-Conditioning System Types

In the 45-day comments, Carrier was concerned with CEC prescribing a fixed product type to be used in a specific application. In the 15-day express terms, CEC added in Subclause G as an alternative option, "A space-conditioning system determined by the Executive Director to use no more energy than the systems specified in Section 140.4(a)3." Carrier argued in the 45-day comments that not all design firms would have the ability to model these buildings to utilize the performance approach to opt for a different technology option. The additional option of subclause G does not change this situation or argument. Carrier is concerned that a design firm would still be required to run a full energy model of the building in order to justify a determination from the Executive Director that the alternative space-conditioning system uses less energy than the prescribed technology option.

Summary:

Carrier appreciates the opportunity to provide further feedback to the CEC on the 2025 cycle of the California Energy Code Rulemaking. Carrier understands the intent behind many of the proposals and current requirements contained in Title 24. However, Carrier believes that the intent can be better achieved by providing more consistent and accurate minimum efficiency requirements and increasing the options on prescriptive product technologies or removing those requirements entirely.

Respectfully submitted,

Pat Riley

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