

DOCKETED

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Project Title:	2025 Energy Code Rulemaking
TN #:	257782
Document Title:	GreenNet Global Alliance Comments - Exception 4 to Section 1802(b)2Aivbl
Description:	N/A
Filer:	System
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Submitted On: 7/17/2024
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Exception 4 to Section 1802(b)2Aivbl

See attached

Additional submitted attachment is included below.

DOCKETED

Docket Number: 24-BSTD-01
Project Title: 2025 Energy Code Rulemaking
Email Address: docket@energy.ca.gov
Docket Unit Phone: 916-654-5076
TN #: 255315-2
Document Title: GreenNet IoT Comments -
Description: N/A
Filer: System
Organization: GreenNet IoT: GreenNet Global Alliance
Submitter Role: Public ?
Submission Date: 7/03/2024
Docketed Date: 7/03/2024

Comment Received From: GreenNet IoT
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Docket Number:

Additional submitted attachment is included below.

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Docket No. 24-BSTD-01 California
Docket Unit, MS-4
Energy Commission Docket Unit,
1516 Ninth Street Sacramento, CA 95814-5512
2025 Building Energy Efficiency Standards

Re: Proposed Change Comments

For the last six years, the GreenNet Global Alliance has established itself as a leader in energy consulting and efficiency solutions, committed to

advancing energy efficiency across the industry. We are a private group of over 300 industry leaders, including a former director of Federal Regulatory Energy Commission, the California State Treasurer's Office, local county and city officials, diagnostic tool manufacturers in the IoT space, including Microsoft, Honeywell, Semtech LoRa, and Changhong Microsoft IoT Innovation Center, HVAC electrical and plumbing contractors, and HERS Raters. Our suggestions aim to optimize energy performance and environmental sustainability using up-to-date AI technology. We wish to collaborate with the California Energy Commission (CEC) in committing to maintain and promote energy standards for all Californians.

The Current CEC Proposed Changes

SECTION 180.2 – ALTERATIONS

Exception 4 to Section 180.2(b)2Aivbl:

Entirely new or complete replacement space-conditioning systems, as specified by Section 180.2(b)2Ai, without zoning dampers may comply with the minimum airflow rate by meeting the applicable requirements in Table 160.3-A or 160.3-B as confirmed by field verification and diagnostic testing in accordance with the procedures in Reference Residential Appendix Sections RA3.1.4.4 and RA3.1.4.5. The design clean-filter pressure drop requirements of Section 160.2(a)1C for the system air filter device(s) shall conform to the requirements given in Tables 160.3-A and 160.3-B.

II. The installer shall charge the system according to manufacturer's specifications. Refrigerant charge shall be verified according to one of the following options, as applicable.

A. The installer and rater shall perform the standard charge verification procedure as specified in Reference Residential Appendix Section RA3.2.2, or an approved alternative procedure as specified in Section RA1; or

B. The installer shall perform the weigh-in charging procedure as specified by Reference Residential Appendix Section RA3.2.3.1, provided the system is of a type that can be verified using the RA3.2.2 standard charge verification procedure and RA3.3 airflow rate verification procedure or approved alternatives in RA1. The HERS ECC-Rater shall verify the charge using RA3.2.2 and RA3.3 or approved alternatives in RA1.

GreenNet Global Alliance Recommends the Following:

Keep the language in Exception 4 to Section 180.2(b)2Aivbl by removing the proposed strikethrough and changing one word in B.:

II. The installer shall charge the system according to manufacturer's specifications. Refrigerant charge shall be verified according to one of the following options, as applicable.

A. The installer and rater shall perform the standard charge verification procedure as specified in Reference Residential Appendix Section RA3.2.2, or an approved alternative procedure as specified in Section RA1; or

B. The system **may** be equipped with a fault indicator display (FID) device that meets the specifications of Reference Joint Appendix JA6. The installer shall verify the refrigerant charge and FID device in accordance with the procedures in Reference Residential Appendix Section RA3.4.2. The HERS ECC-Rater shall verify FID device in accordance with the procedures in Section RA3.4.2; or

C. The installer shall perform the weigh-in charging procedure as specified by Reference Residential Appendix Section RA3.2.3.1, provided the system is of a type that can be verified using the RA3.2.2 standard charge verification procedure and RA3.3 airflow rate verification procedure or approved alternatives in RA1. The HERS ECC-Rater shall verify the charge using RA3.2.2 and RA3.3 or approved alternatives in RA1.

The GreenNet Global Alliance endorses removing the strikeouts and including our minor recommendations in Part B. The Fault Indicator Display (FID) technology exists and is currently being utilized to meet the specifications of Joint Appendix JA6.

