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Comment Received From: Rachel MacDonald

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Comments filed on behalf of Ruben Willmarth of Carrier

Additional submitted attachment is included below.



I want to thank the commission for the opportunity to “iron out” some of the wrinkles in the 2013 code in a timely manner.

In my position, I’ve had the opportunity to get feedback from many people in the engineering community. I’ve found the current code for application of economizers has been quite confusing to many in the field when it comes to VRF systems, with many incorrectly assuming the controls language also applies to the selection of an economizer. The original proposed language of section 140.4(e)1 used to read “Each individual cooling fan system that has a design mechanical cooling capacity over 54,000 btu, and an airflow of 1800 cfm, shall include... an airside economizer...”

While the 1,800 cfm was removed in order to align with ASHRAE 90.1 language, it did offer clarity that I have missed, and the word “individual” was another clarifier, but was removed in the 15 Day language, for reasons I could not ascertain. I realize the controls language in section 120 has already been corrected for the 2016 code, but until then, I would ask the commission that the word “individual” be restored to section 140 language to help provide the clarity needed when it is read by all going forward.