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| Project Title: | Appliance Efficiency Standards Emergency Rulemaking for Residential Air Filters |
| TN #: | 216624 |
| Document Title: | Air-Conditioning, Heating, & Refrigeration Institute (AHRI) Comments: On Emergency Rulemaking to Amend Title 20 - Air Filters |
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Comment Received From: Air-Conditioning, Heating, & Refrigeration Institute (AHRI)

Submitted On: 3/20/2017

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On Emergency Rulemaking to Amend Title 20 - Air Filters

Additional submitted attachment is included below.



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2111 Wilson Boulevard Suite 500 Arlington VA 22201-3001 USA
Phone 703 524 8800 | Fax 703 562 1942
www.ahrinet.org

March 20, 2017

Docket Unit
California Energy Commission
Docket No. 17-AAER-02
1516 9th Street, MS-4
Sacramento, CA 95814

Re: AHRI Comments – Emergency Rulemaking to Amend Title 20 - Air Filters [*Docket Number 17-AAER-02*]

Dear CEC Staff:

These comments are submitted in response to the California Energy Commission (CEC) emergency rulemaking package on residential air filters which was filed with the Office of Administrative Law on Wednesday March 15, 2017. This rulemaking delays the compliance date for the air filter testing, certification, and marking requirements to April 1, 2019.

AHRI is the trade association representing manufacturers of heating, cooling, water heating, and commercial refrigeration equipment. More than 300 members strong, AHRI is an internationally recognized advocate for the industry, and develops standards for and certifies the performance of many of the products manufactured by our members. In North America, the annual output of the HVACR industry is worth more than \$20 billion. In the United States alone, our members employ approximately 130,000 people, and support some 800,000 dealers, contractors, and technicians.

AHRI understands that CEC's labeling objectives are to enable consumers to replace filters with ease and to improve the energy efficiency performance of HVAC equipment and appreciates that the emergency rulemaking offers the opportunity to correct several severe technical aspects of the rule. We support the Commission's finding of necessity to delay the compliance date of the existing regulations. AHRI members are working diligently to revise ANSI/AHRI Standard 680-2015, *Performance Rating of Residential Air Filter Equipment*, which will provide the necessary consistency required for the labeling and listing of products by allowing the extrapolation of a tested product's ratings to other filters of different sizes based on airflow. We look forward to CEC staff's review and comments on the draft.

On other aspects, including (1) AHRI's request that CEC update its guidance on air filter testing to make it clear that the ratings of electronic air filters be established by testing (or appropriate extension of test data by airflow) with the power source engaged; and (2) confirmation that the scope only applies to filters in ducted unitary equipment and to filters offered for sale to consumers in retail outlets or through distributors, AHRI looks forward to continued conversations with CEC staff to find resolution so that air filter testing, certification, and marking requirements will be ready for the revised compliance deadline of April 1, 2019.

AHRI also urges CEC staff to engage with the utilities to ensure that filter regulations specified in Title 20 and Title 24 are consistent. During the second Title 24-2019 utility-sponsored stakeholder meeting on residential and non-residential indoor air quality (IAQ) held on March 16, 2017, proposals were made to add a Minimum Efficiency Reporting Values (MERV) requirement derived from ASHRAE Standard 52.2, *Method of Testing General Ventilation Air-Cleaning Devices for Removal Efficiency by Particle Size* for non-residential spaces, with no mention of a proposal for minimums derived from AHRI Standard 850, *Performance Rating of Commercial and Industrial Air Filter Equipment*. AHRI encourages CEC staff to remain vigilant of such issues, as this emergency rulemaking highlights the surprising complexity of air filter testing, certification, and marking requirements.

AHRI appreciates the opportunity to provide these comments. If you have any questions regarding this submission, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'LPG', with a stylized flourish at the end.

Laura Petrillo-Groh, PE
Senior Engineering Manager, Regulatory Affairs
Direct: (703) 600-0335
Email: LPetrillo-Groh@ahrinet.org

Cc: Office of Administrative Law
300 Capitol Mall, Suite 1250
Sacramento, CA 95814