

## DOCKETED

<b>Docket Number:</b>	17-AAER-14
<b>Project Title:</b>	Appliance Efficiency Standards Certification Rulemaking for Residential Air Filters, Residential Pool Pump and Motor Combinations, and Replacement Residential Pool Pump Motors
<b>TN #:</b>	217980
<b>Document Title:</b>	Email from 3M 11-16-2016
<b>Description:</b>	Supporting document originally filed in Docket No. 17-AAER-02
<b>Filer:</b>	Patrick Saxton
<b>Organization:</b>	California Energy Commission
<b>Submitter Role:</b>	Commission Staff
<b>Submission Date:</b>	6/8/2017 12:25:54 PM
<b>Docketed Date:</b>	6/8/2017

## DOCKETED

<b>Docket Number:</b>	17-AAER-02
<b>Project Title:</b>	Appliance Efficiency Standards Emergency Rulemaking for Residential Air Filters
<b>TN #:</b>	216235
<b>Document Title:</b>	Email from 3M 11-16-2016
<b>Description:</b>	N/A
<b>Filer:</b>	Patrick Saxton
<b>Organization:</b>	3M/Bryan Gerhardt
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	2/24/2017 2:36:39 PM
<b>Docketed Date:</b>	2/24/2017

## Saxton, Patrick@Energy

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**From:** Bryan Gerhardt <bgerhardt@mmm.com>  
**Sent:** Wednesday, November 16, 2016 5:20 AM  
**To:** Energy - Appliances  
**Cc:** Gene Portelli; Brenan Pultz  
**Subject:** RE: air filter testing for CEC

Bruce,

I am updating our spreadsheet so we can load it into the system, but I am seeing inconsistencies (or at least my understanding) on the instructions and what you state.

*“3M should resubmit and leave the MERV, all PSE, and all Air Flow Rate fields blank since MAEDBS noticed they used only ASHRAE 52.2-2012 during the test”*

You state to leave all PSE and Merv fields “blank”, but the ASHRAE 52.2 test gives a Merv rating and PSE (particle size efficiency) values. The instructions state to leave blank if not applicable, but I believe it would be applicable. Should we list the Merv rating for our ASHRAE tested filters and the Particle size efficiency?

You also state to “leave all Air Flow Rate fields blank since MAEDBS noticed they used only ASHRAE 52.2-2012 during the test”. This is consistent with the instructions which state for “Airflow Rate value n CFM” only required for A (AHRI 680-2009) or C. The instructions for “Initial Resistance At Airflow Rate n” state only required if code B (ASHRAE 52.2-2012). Is “Airflow Rate value 1 CFM” related directly to “Initial Resistance At Airflow Rate 1”? Shouldn’t both the Airflow CFM and resulting Initial Resistance be listed? Having one piece of data without the other, does not seem to give a full picture of the performance for the consumer.

If you can provide clarification on these two questions will help us get the data loaded when the IT issue is resolved.



**Bryan Gerhardt**

3M CHIM Division

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**From:** Brenan Pultz  
**Sent:** Thursday, November 10, 2016 1:26 PM  
**To:** Energy - Appliances <Appliances@energy.ca.gov>  
**Cc:** Bryan Gerhardt <bgerhardt@mmm.com>; Gene Portelli <gbportelli@mmm.com>  
**Subject:** RE: air filter testing for CEC

Hello Bruce,

Thank you for the update, once we have received confirmation this IT issue has been resolved, 3M will go back into the database to submit our data package.

Thank you for your help,

Brenan Pultz



**Brenan Pultz** | Advanced Regulatory Affairs Chemist  
**Construction & Home Improvement Markets Division**  
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**From:** Energy - Appliances [<mailto:Appliances@energy.ca.gov>]  
**Sent:** Thursday, November 10, 2016 12:52 PM  
**To:** Brenan Pultz <[bpultz@mmm.com](mailto:bpultz@mmm.com)>  
**Cc:** Bryan Gerhardt <[bgerhardt@mmm.com](mailto:bgerhardt@mmm.com)>; Gene Portelli <[gbportelli@mmm.com](mailto:gbportelli@mmm.com)>  
**Subject:** [EXTERNAL] RE: air filter testing for CEC  
**Importance:** High

Hello Brian,

I raised this issue with our IT unit and they replied:

“The Null vs. zero confusion may not have been the issue. The data fields were hanging up in the validation on an odd MAEDBS error. I went in and was able to fix this. Also, we found that a field width needed to be extended to accommodate higher CFM values at low resistance which I’ve just created a ticket for. After I.T. puts in the fix (hopefully by early next week),

Thank you,  
Bruce

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**From:** Energy - Appliances  
**Sent:** Tuesday, November 08, 2016 2:07 PM  
**To:** 'Brenan Pultz'  
**Cc:** Bryan Gerhardt; Gene Portelli  
**Subject:** RE: air filter testing for CEC

Hello Brenan,

I see that your lab was approved as a test lab for ASHRAE 52.2-2012 on 9/30/2016.  
I do not see a submittal for 3M that has come through to our system yet so I suppose that the statements that you provided below are the **automatic** responses issued directly by the program software.  
They are intended to point out **format** issues that are usually fixed by re-reading the instructions. The inputs to the template must be in the exact format that is described in the instructions for the computer to properly validate the template. Please note that the words NULL = zero (0) and BLANK means no value.  
Please review my comments inserted to your email below, in **red**.  
If this guidance is unclear or does not work, please give me a call to discuss further.

Thank you,  
**Bruce Helft**

**Appliance Efficiency Unit**  
**Title 20 Compliance Assistance**  
California Energy Commission  
1516 Ninth Street, MS 25  
Sacramento, California 95814  
(916) 654-4080



**From:** Brenan Pultz [<mailto:bpultz@mmm.com>]  
**Sent:** Tuesday, November 08, 2016 1:09 PM  
**To:** Energy - Appliances; Helft, Bruce@Energy  
**Cc:** Bryan Gerhardt; Gene Portelli  
**Subject:** RE: air filter testing for CEC

Hello Mr. Helft,

We are trying to upload our spreadsheet listed above but we have run into a few errors that we do not quite understand based on the data we have filled out.

“PSE for 0.3 to 1.0 um particle size must be Null”

-There needs to be a value of null, meaning a value of 0 (zero). For many cells in this column ‘M’ that value is empty. Please enter a 0 in that cell and see if that assists.

“Airflow rate at initial resistance of 0.1 inch WC in CFM type or length is not valid. Please refer to instructions for field specifications”

-The instructions state, “Only required if the code **A** (AHRI 680-2009) or **C** (Both AHRI 680-2009 AND ASHRAE 52.2-2012) were selected for Test Procedure used, otherwise leave blank”. You entered ‘B’ for the test procedure used so the cells should remain ‘blank’ per the instructions.

“PSE for 1.0 to 3.0 um particle size must be Null”

-It appears that in the column referenced here (O) there are two cells left blank that either need a numeric value or a zero.

“PSE Small below 20 must be Null”

-Same as above but for column M.

Your help would be greatly appreciated.

Regards,

Brenan Pultz



**Brenan Pultz** | Advanced Regulatory Affairs Chemist  
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**From:** Energy - Appliances [<mailto:Appliances@energy.ca.gov>]  
**Sent:** Monday, November 07, 2016 10:49 AM  
**To:** Helft, Bruce@Energy <[Bruce.Helft@energy.ca.gov](mailto:Bruce.Helft@energy.ca.gov)>  
**Subject:** [EXTERNAL] air filter testing for CEC

Hello,

I noticed that you are the assigned contact for a test lab that has been approved by the California Energy Commission to test air filters. To date no air filters have been certified to the Commission's database. I am writing to understand if there is any problem that you are aware of in certifying air filters to the Commission.

The requirement to certify to the database has been in effect since July 1, 2016 and yet no models are certified as of this writing.

Please advise further.

Thank you,  
**Bruce Helft**

**Appliance Efficiency Unit**  
**Title 20 Compliance Assistance**  
California Energy Commission  
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Sacramento, California 95814  
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