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SMUD Comments on Webinar Re: Phase 2 Appliance Efficiency Regulations & Roadmaps

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Additional submitted attachment is included below.

STATE OF CALIFORNIA
BEFORE THE CALIFORNIA ENERGY COMMISSION

In the matter of:	)	Docket No. 17-AAER-05
	)	
Phase 2 Appliance Efficiency Regulations and Roadmaps	)	SMUD Comments on Webinar RE: Phase 2 Appliance Efficiency Regulations & Roadmaps
	)	
	)	June 16th, 2017

Comments of the Sacramento Municipal Utility District Pursuant to Webinar for Phase 2 Appliance Efficiency Regulations and Roadmaps

The Sacramento Municipal Utility District (SMUD) respectfully submits the following comments Pursuant to the webinar for Phase 2 Appliance Efficiency Regulations and Roadmaps held on May 11, 2017. SMUD has comments on two of the topics that have been raised for discussion in the Phase 2 Appliance Efficiency Regulations (Phase 2 Regulations).

Blowers and Fans – Docket 17-AAER-06

SMUD believes that the scope of the blowers and fans part of the rulemaking should be established with adequate reflection of certain complexities and other jurisdictional activity, in order to avoid unnecessary duplication and problematic regulations. Specifically, SMUD believes the CEC should consider the following:

- Most Fans and Blowers are not unitary in nature. Most fans and blowers are either incorporated into air handling equipment by an OEM, or are components included in a custom-engineered "built-up system". The Title-20 "Appliance" Standard might be the wrong place for these types of applications. Some fan and blower applications that might be appropriate for Title-20 might include evaporative coolers, commercial-sized pedestal fans and portable fans, room exhaust fans, whole house fans, restaurant hood fans, laboratory hood fans. Most of these applications (except for the hoods) are constant speed and have easily understood performance characteristics that are similar across similar installations.

- Products that an O.E.M might integrate into a piece of equipment (HVAC for example), appear to be under active pursuit and discussion by the DOE. The CEC should take care to not unnecessarily duplicate or complicate DOE consideration of similar equipment. However, It might be in the interest of the CEC to include HVAC fan efficiency factors in Title 24 Part 6, adjacent to the EER/IEER tables (2016 Standards Table 110.2-A for example). This would ensure that "Engineered to Order" and non-standard airflow designs use appropriately selected fans. This approach could be taken in data center cooling (CRAH, CRAC) applications as well.

- The rulemaking should clearly exclude built-up (site built) industrial-process applications from the standards- at least initially. The process requirements could be highly variable, and not easily categorized. Because of the numerous variables (hours of operation, turndown requirements, airflow, static pressure, solids handling, etc.), and the wide range of fan types and geometries, the resulting engineering considerations would make an efficiency standard very difficult. A tangible example would be if an efficiency standard required a manufacturer to buy a large fan to satisfy an efficiency requirement, but the hours of operation are small. Not being able to balance the first cost/energy savings relationship could place a cost penalty on a manufacturer.

- There may be adequate equipment standardization in some industrial OEM-engineered equipment to develop and adopt a fan/blower standard. The CEC could focus on common industrial large scale, high-utilization applications and pursue only those in the initial standard. OEM Packaged applications may include systems for dust collection or car dryers for example.

- The CEC should consider excluding high volume, low static (HVLS) fans from the standard. HVLS fans are generally used in lieu of smaller, less efficient portable fans – and more commonly now being used in place of HVAC supply air fans.

- The CEC should consider excluding high static blowers (regenerative blowers, rotary vane blowers, roots blowers, for example) from the initial standard. These may not be under active consideration, but are described as types of "blowers", so clarity about their inclusion or exclusion would be useful.

General Service Lighting – Docket 17-AAER-07:

SMUD believes that the CEC should adopt the new definition of general service lamps being developed at the Federal level, and by doing so to accept the proposed discontinuation of the exemption of Incandescent Reflector Lamps (IRLs). These types of lamps appear to represent a loophole in current standards that has led to increased sales and adoption of less efficient lighting. At the same time, LEDs have advanced greatly and continue to do so as manufacturers provide R&D dollars for advancing this

technology. LEDs are offered in a multitude of shapes and sizes to accommodate most of the discontinued exempted lamps (R-lamps, 3-way, G25/30, etc.). Adopting this new definition (which may become effective as early as 1/1/18) will help achieve state efficiency and Zero Net Energy goals.

/s/

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