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Weil McLain Comments on Commercial and Industrial Fans & Blowers

Additional submitted attachment is included below.



September 18, 2017

California Energy Commission Docket Unit, MS-4 Re: Docket No. 17-AAER-06 1516 Ninth Street Sacramento, CA 95814-5512

Re: Docket No. 17-AAER-06 - Commercial and Industrial Fans & Blowers

Dear Mr. Galdamez:

Thank you for the opportunity to provide comment on this important topic. Weil-McLain is a leading North American designer and manufacturer of long-lasting, hydronic (i.e. liquid radiant heat) comfort heating systems for residential, commercial and institutional buildings. We have been employing Americans for the manufacture of our products since 1881. Most of our customers purchase our hydronic comfort heating systems because they are cost-effective, reliable, and long lasting. With over a century of experience to draw from, Weil-McLain understands the importance of Industrial Fans & Blowers to our customers.

Weil McLain dedicates a team of full time specialists to ensuring its products are compliant with state and federal regulations. Fans embedded in HVACR equipment (Embedded HVAC Fans) are already covered by California Building Standards (Title 24), and the California Appliance Efficiency Standards (Title 20). Weil-McLain, therefore, supports the Air Conditioning, Heating, and Refrigeration Institute's (AHRI) proposal that the CEC exempt all Embedded HVAC Fans from its proposed regulation. Additionally, Weil McLain is concerned that the proposed regulations, as worded, have the undesirable effect of reducing the efficiencies for regulated equipment utilizing very large blowers. Specifically, Weil-McLain is concerned this regulation will unintentionally reduce the efficiency of commercial boilers which utilize a blower in the combustion system.

It is our position that due to 1) the redundancy potential of the regulation, and 2) the unintentional negative impact on efficiencies, industrial fans and blowers present in already regulated applications should be excepted from this new regulation.

Sincerely

Brian Szymanowski

Director, Product Engineering

Weil McLain

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