

## DOCKETED

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## **FAN EFFICIENCY INDEX A FALSE METRIC**

PLEASE NOTE THE NODA 3 SPREADSHEET CAN BE ENLARGED FOR PROPER VIEWING.

*Additional submitted attachment is included below.*

FEI or Fan Energy Index is a false metric. It does not fairly represent the true energy usage by all fans because it uses two different calculations for FEI. One calculation uses static pressure and velocity pressure in the numerator and the other calculation uses only static pressure in the numerator.

All fans develop both static pressure and velocity pressure and their sum is called total pressure. All fans develop static pressure due to the resistance of air flow caused by the fan's surroundings whether it is duct work, a hood, a shutter or the design of the building. Velocity pressure is due to the movement of air. The greater the air velocity the greater the velocity pressure. The goal here is to prove for an equal value of CFM/Watt wall fans and power roof ventilators are penalized unfairly by excluding their velocity pressure component in the calculation of FEI. In fact, FEI actually discriminates against all low pressure high volume flow fans. These wall fans and PRVs fans would easily pass the efficiency level of EL3 if they used total pressure instead of just static pressure in the calculation of FEI.

Some argue that wall fans and PRVs waste the velocity pressure because the air is not pushed down a pipe or duct and therefore velocity pressure should not be included in the calculation of FEI for non ducted fans. This is false because non ducted fans pull the air throughout the building and this air velocity or wind component is exhausted to the outside of the building. Some would argue that it is difficult to test non ducted fans for velocity pressure, however, it can easily be calculated using the Fan Laws.

In agricultural applications this air velocity is used in all Tunnel ventilated housing for poultry, greenhouse, and dairy installations. Currently most poultry houses require a minimum of 600 feet per minute of air velocity. It has been proven that cows provide 10 percent more milk when they have fans blowing on them. In most factories waste heat needs to be removed from the building and fresh air supplied. Paint shops use power roof ventilators to filter the air exhausted from the paint booth. In restaurants power roof ventilators are used to extract heat from the kitchen and filter the air supplied.

Ducted fans tend to push the air down a pipe which some believe is the only good use of velocity pressure. This is the invalid reason for the two different calculations of FEI for ducted and non ducted fans. Ducted and non ducted fans cannot be fairly evaluated with this single metric. The real travesty is shown below where for the same CFM/Watt a ducted fan gets a passing FEI value and a wall fan or power roof ventilator does not.

Lines 18-29 depict the results for wall fans with the same CFM, BHP, SP and TP by calculating the FEI as a ducted fan and then as a non ducted fan. Line 18 shows a wall fan performance calculated as a ducted fan with total pressure and then line 19 shows the same performance but calculated using only static pressure. Since velocity pressure is only used in the ducted fan equation as a numerator the FEI result is much higher, FEI of 1.42 vs. 1.08 for the same CFM/watt. This is a difference of .34 FEI. The ducted fan is suppose to be 23.94 percent more efficient than the wall fan. How untrue. Note at EL3 the target efficiency used was a .66 for a ducted fan and .62 for a non ducted fan thus if we really had a universal metric like FEI then for the same CFM/watt the target efficiency for the non ducted fan would have to be at 50.20 percent not 62 percent. So we really have 2 calculations that create two different FEI values.

One is artificially enhanced with velocity pressure plus static pressure and the non ducted fan only uses static pressure.

Up blast power roof ventilators, JDC36P PRV, on lines 20 and 21 show similar results with FEI ducted 1.31 vs. non ducted 1.04 for the same CFM/watt. The ducted fan is 20.61 percent more efficient? No it is not. Lines 22 and 23 show a low profile hooded exhaust, PDC36P PRV at 3 hp failing both categories due to hood losses and proximity of roof: .87 FEI ducted fan vs. .78 non ducted FEI.

Lines 24 and 25 show same low profile fan, PDC36N, with a smaller 2 HP motor with FEI of 1.03 vs. .97 and again the ducted fan passes and the non ducted fan fails. Lines 26 and 27 depict a hooded exhaust PRV, PEDC36P, ducted 1.16 vs. non ducted .95 FEI but both fans use the same CFM/watt. This means for the same energy consumption the ducted fan passes and the PRV does not and supposedly the ducted fan is 18.11 percent more efficient. Not at all.

Lines 28 and 29 show a hooded supply fan, PSDC36P, 1.13 ducted fan vs. .93 non ducted fan FEI. Where is the 21.51 percent savings in electricity?

Lets look at some larger wall fans on lines 30 and 31. The CBC54Q, 5HP 1.39 FEI as a ducted fan vs. non ducted .92 FEI. Where is the 33.81 percent savings in energy?

Lines 32 and 33 show another wall fan, CBC54R, calculated as a ducted fan 1.18 vs. non ducted fan .82 FEI. Where is the 30.51 percent savings in energy?

CBC 54S, 10HP, FEI 1.17 ducted vs. FEI .72 non ducted. A difference of .45 FEI but using the same amount of energy.

Lines 36 and 37 large hooded exhaust ventilators, PEDC54Q8, barely passes 1.00 ducted and .78 non ducted. The next two are both losers PEDC54R8, .98 ducted and .75 non ducted and PEDC54S11, .86 ducted and .62 non ducted.

Up blast power roof ventilators, JBH48P, 1.51 ducted and 1.22 non ducted a difference of .29. JBH48Q, 5 HP, 1.32 ducted fan and .93 non ducted fan . Our JBC 84S, a 10 hp Up Blast PRV, on line 46 and 47 passes ducted 1.54 and non ducted at 1.19 FEI but a difference of .35 FEI for the same performance.

Obviously there is a pattern to all of these calculations. A ducted fan gets to use both static pressure and velocity pressure and a wall fan or PRV can only use static pressure. The real question to ask is why? Could it be that the centrifugal blower market is much larger in sales volume and profit margin than the wall fan and PRV market. Could it be that the vested interests on the ASRAC committee were more interested in protecting their more profitable ducted axial and centrifugal fan products at the expense of the small wall fan and small PRV manufacturers. Why did the ASRAC committee chose to agree to arbitrarily reduce total fan selections by 25 percent based on prior DOE negotiations with the pump industry. Why would it not be logical for each category of fan to lose 25 percent rather than the wall fans losing 22 percent and PRV sectors axial 55 percent and centrifugal PRVs losing 35 percent of their selections based on this false FEI metric instead of using a CFM/watt metric. Yet the ducted centrifugal

fans losing only 4 percent for airfoil blades and only 9 percent for backward inclined bladed fans. The ducted tube axials at 19 percent and the ducted vane axial fans at 10 percent.

Why is AMCA so opposed to the Bess Labs metric of CFM/ Watt? At Bess Labs the fans are real world tested with shutters, guards, and cones just like they would be used in a farmer's barn or poultry house. AMCA lost the agricultural markets over thirty years ago. Bess Labs is the worldwide authority on agricultural fans. They have tested over 1900 fans and they are listed on Bess Labs website. Why is there such insistence within AMCA on this false FEI metric to be the only metric of fan electrical efficiency? Why can AMCA not coexist with Bess Labs?

Financial Performance Report - FY2023

Category	Value	Unit
Revenue	1000	USD
Expenses	800	USD
Profit	200	USD

Item	Description	Category	Status	Budget		Actual		Variance		Trend		Forecast		Risk		Action	
				Start	End	Start	End	Start	End	Start	End	Start	End	Start	End	Start	End
001	Item 1	Category A	Active	2023-01-01	2023-12-31	1000	1000	1000	1000	0	0	1000	1000	0	0	Low	Monitor
002	Item 2	Category B	Active	2023-01-01	2023-12-31	800	800	800	800	0	0	800	800	0	0	Low	Monitor
003	Item 3	Category C	Active	2023-01-01	2023-12-31	200	200	200	200	0	0	200	200	0	0	Low	Monitor
004	Item 4	Category A	Active	2023-01-01	2023-12-31	1000	1000	1000	1000	0	0	1000	1000	0	0	Low	Monitor
005	Item 5	Category B	Active	2023-01-01	2023-12-31	800	800	800	800	0	0	800	800	0	0	Low	Monitor
006	Item 6	Category C	Active	2023-01-01	2023-12-31	200	200	200	200	0	0	200	200	0	0	Low	Monitor
007	Item 7	Category A	Active	2023-01-01	2023-12-31	1000	1000	1000	1000	0	0	1000	1000	0	0	Low	Monitor
008	Item 8	Category B	Active	2023-01-01	2023-12-31	800	800	800	800	0	0	800	800	0	0	Low	Monitor
009	Item 9	Category C	Active	2023-01-01	2023-12-31	200	200	200	200	0	0	200	200	0	0	Low	Monitor
010	Item 10	Category A	Active	2023-01-01	2023-12-31	1000	1000	1000	1000	0	0	1000	1000	0	0	Low	Monitor
011	Item 11	Category B	Active	2023-01-01	2023-12-31	800	800	800	800	0	0	800	800	0	0	Low	Monitor
012	Item 12	Category C	Active	2023-01-01	2023-12-31	200	200	200	200	0	0	200	200	0	0	Low	Monitor
013	Item 13	Category A	Active	2023-01-01	2023-12-31	1000	1000	1000	1000	0	0	1000	1000	0	0	Low	Monitor
014	Item 14	Category B	Active	2023-01-01	2023-12-31	800	800	800	800	0	0	800	800	0	0	Low	Monitor
015	Item 15	Category C	Active	2023-01-01	2023-12-31	200	200	200	200	0	0	200	200	0	0	Low	Monitor
016	Item 16	Category A	Active	2023-01-01	2023-12-31	1000	1000	1000	1000	0	0	1000	1000	0	0	Low	Monitor
017	Item 17	Category B	Active	2023-01-01	2023-12-31	800	800	800	800	0	0	800	800	0	0	Low	Monitor
018	Item 18	Category C	Active	2023-01-01	2023-12-31	200	200	200	200	0	0	200	200	0	0	Low	Monitor
019	Item 19	Category A	Active	2023-01-01	2023-12-31	1000	1000	1000	1000	0	0	1000	1000	0	0	Low	Monitor
020	Item 20	Category B	Active	2023-01-01	2023-12-31	800	800	800	800	0	0	800	800	0	0	Low	Monitor
021	Item 21	Category C	Active	2023-01-01	2023-12-31	200	200	200	200	0	0	200	200	0	0	Low	Monitor
022	Item 22	Category A	Active	2023-01-01	2023-12-31	1000	1000	1000	1000	0	0	1000	1000	0	0	Low	Monitor
023	Item 23	Category B	Active	2023-01-01	2023-12-31	800	800	800	800	0	0	800	800	0	0	Low	Monitor
024	Item 24	Category C	Active	2023-01-01	2023-12-31	200	200	200	200	0	0	200	200	0	0	Low	Monitor
025	Item 25	Category A	Active	2023-01-01	2023-12-31	1000	1000	1000	1000	0	0	1000	1000	0	0	Low	Monitor
026	Item 26	Category B	Active	2023-01-01	2023-12-31	800	800	800	800	0	0	800	800	0	0	Low	Monitor
027	Item 27	Category C	Active	2023-01-01	2023-12-31	200	200	200	200	0	0	200	200	0	0	Low	Monitor
028	Item 28	Category A	Active	2023-01-01	2023-12-31	1000	1000	1000	1000	0	0	1000	1000	0	0	Low	Monitor
029	Item 29	Category B	Active	2023-01-01	2023-12-31	800	800	800	800	0	0	800	800	0	0	Low	Monitor
030	Item 30	Category C	Active	2023-01-01	2023-12-31	200	200	200	200	0	0	200	200	0	0	Low	Monitor

Report generated on 2023-12-31. All values are in USD unless specified otherwise.