

## DOCKETED

<b>Docket Number:</b>	17-BSTD-01
<b>Project Title:</b>	2019 Building Energy Efficiency Standards PreRulemaking
<b>TN #:</b>	221969
<b>Document Title:</b>	QC Manufacturing, Inc. Comment re Attic Fans as a Compliance Option
<b>Description:</b>	Staff docketed comment from Andy Llorca, QC Manufacturing, Inc.
<b>Filer:</b>	Adrian Ownby
<b>Organization:</b>	QC Manufacturing, Inc.
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	12/14/2017 10:40:38 AM
<b>Docketed Date:</b>	12/14/2017

December 11, 2017

Mr. Todd Ferris  
California Energy Commission  
Docket Unit, MS-4  
1516 Ninth Street  
Sacramento, CA 95814-5512

**Re: Docket: 17-BSTD-01 Title 24 Compliance Options**

Submitted by: Andy Llorca / Dane Stevenson  
  
QC Manufacturing, Inc.

**Subject: Attic Fans as a Compliance Option**

Dear Mr. Ferris,

When attic fans were studied many years ago as a compliance option, the attic cooling benefits were weighed against the watt consumption and found to be a wash or possibly an expense to even operate. Attic fans were then considered to no longer be a viable T24 compliance option.

Since that time, many measures give significant T24 credits for cooling the attic and preventing conduction of the heat from the HVAC duct system, such as radiant barrier, high-performance attics, and duct insulation. A powered attic ventilation system that is passive, requiring no homeowner interaction, can result in significant savings if the product efficiencies are adequate.

Comments:

Since that study was concluded many years ago, QC Manufacturing has developed high-efficiency variable speed smart attic fans. Variable speed ECM motors power our 10-speed smart attic fan and are pre-programmed to produce airflow from zero to 2500+ CFM on demand, based on either humidity or temperature of the attic.

We would like to share recent attic fan data with the CEC for this type of product to be reconsidered, since the CFM has been greatly increased, and the watt consumption has been decreased dramatically since the last time this product was considered.

In our recent study, we were able to obtain a min temperature of 64 degrees, with a max of 103 degrees during August of 2017, consuming an average of 21.02 watts, measured in 1-minute increments. We would like to share the bulk of this data with the CEC, for them to review the new products available, for input into the old study algorithms, and we feel you will find that this may be a viable new compliance option, generating significant savings in kW/H consumption during the summer months.

QC Manufacturing, Inc. appreciates the Energy Commission's consideration of these comments and looks forward to collaborating with the Energy Commission and stakeholders as these standards are further developed. Please do not hesitate to contact me at [\(209\) 342-9482](tel:2093429482) with any questions or concerns you may have. I am available to discuss these matters further at your convenience.

Sincerely,

Andy Llorca

QC Manufacturing, Inc.