

DOCKETED

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Document Title:	Mitsubishi Email Regarding Obstacles to Heat Pump Marketability
Description:	N/A
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From: Severance, Bruce <bseverance@hvac.me.com>
Sent: Sunday, April 01, 2018 1:37 PM
To: Energy - Docket Optical System
Subject: Obstacles to Heat Pump Marketability
Attachments: ObstaclesToVCHP Marketability.pdf

Dear CEC Staff,

My recollection is that the deadline to upload information or comments relevant to the proposed 2019 Code language was March 5th.

Mitsubishi Electric has already submitted an extensive document regarding code language.

The attached article on obstacles to advanced heat pump marketability in California relates directly to the code as it addresses the need for the CEC to adopt standard test protocols for lab and field testing of HVAC equipment as well as conduct further research on the test paradigm variables that seem to affect a high correlation in the results or equipment ratings between field and lab tests.

Some CEC studies of HVAC system performance has not seen as high a correlation to AHRI ratings as other studies performed by independent agencies outside the state. This paper explores possible explanations for this lower correlation as well as the need to adopt AHRI equipment ratings in the absence of other standardized test protocols. The CEC's hesitation to adopt AHRI ratings is severely restricting the use of systems that are known to be more efficient than the default ratings accepted by the CEC.

We are asking that full consideration be given to this request, and that the CEC support ongoing multi-lateral discussions among stakeholders, manufacturers and regulators to develop improved test protocols over the coming years. In the meantime, AHRI ratings have been fully vetted by industry and state agencies including the USDOE. We believe these test methods are not perfect, but they are highly accurate as has been confirmed by numerous agencies and studies.

Thank you for this consideration.

Sincerely,
Bruce Severance
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