

DOCKETED

Docket Number:	17-BSTD-02
Project Title:	2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking
TN #:	223334
Document Title:	Edison Electric Institute Comments On 2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking
Description:	N/A
Filer:	System
Organization:	Edison Electric Institute
Submitter Role:	Public
Submission Date:	5/7/2018 9:39:45 AM
Docketed Date:	5/7/2018

Comment Received From: Edison Electric Institute

Submitted On: 5/7/2018

Docket Number: 17-BSTD-02

On 2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking

Additional submitted attachment is included below.

From: Rosenstock, Steven <SRosenstock@eei.org>
Sent: Monday, May 07, 2018 9:36 AM
To: Energy - Docket Optical System
Cc: Rosenstock, Steven
Subject: 2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking

To whom it may concern,

As I was reviewing the 15-day language, I noticed that Table 110.2-J needs revisions. It violates the National Appliance Energy Conservation Act of 1987 (and amendments) and federal pre-emption by allowing furnaces to be less efficient (and use more energy) than current federal regulations.

Here are the current federal regulations for residential gas furnaces (and the web site link they can be accessed):

https://www.ecfr.gov/cgi-bin/text-idx?SID=fc7fa20e64045953a3d7810dd2b29482&mc=true&node=se10.3.430_132&rgn=div8

(ii) The AFUE of residential furnaces shall not be less than the following starting on the compliance date indicated in the table below:

Product class	AFUE (percent)¹	Compliance date
(A) Non-weatherized gas furnaces (not including mobile home furnaces)	80	November 19, 2015.
(B) Mobile Home gas furnaces	80	November 19, 2015.
(C) Non-weatherized oil-fired furnaces (not including mobile home furnaces)	83	May 1, 2013.
(D) Mobile Home oil-fired furnaces	75	September 1, 1990.
(E) Weatherized gas furnaces	81	January 1, 2015.
(F) Weatherized oil-fired furnace	78	January 1, 1992.
(G) Electric furnaces	78	January 1, 1992.

¹Annual Fuel Utilization Efficiency, as determined in §430.23(n)(2) of this part.

Below is the 15-day language table:

http://docketpublic.energy.ca.gov/PublicDocuments/17-BSTD-02/TN223246-2_20180420T104550_2019_Standards_Part_6_Chapter_2_Section_110_Revised_Express_Ter.pdf

TABLE 110.2-J Warm-Air Furnaces and Combination Warm-Air Furnaces/Air-Conditioning Units, Warm Air Furnaces, and Unit Heaters

Equipment Type	Size Category (Input)	Subcategory or Rating Condition ^b	Minimum Efficiency ^{d,e}	Test Procedure ^a
Warm-Air Furnace, Gas-Fired	< 225,000 Btu/h	Maximum Capacity ^b	78% AFUE or 80% E _t	DOE 10 CFR Part 430 or Section Thermal Efficiency, ANSI Z2
	≥ 225,000 Btu/h	Maximum Capacity ^b	80% E _t	Section 2.39, Thermal Efficiency Z21.47
Warm-Air Furnace, oil-Fired	< 225,000 Btu/h	Maximum Capacity ^b	78% AFUE or 80% E _t	DOE 10 CFR Part 430 or Section Combustion, UL 727
	≥ 225,000 Btu/h	Maximum Capacity ^b	81% E _t	Section 42, Combustion, UL

For residential gas furnaces, the federal minimum is either 80% AFUE (non-weatherized) or 81% AFUE (weatherized). A state value of 78% AFUE is not allowed under federal law.

For residential oil furnaces, the federal minimum is 83% for non-weatherized and 78% for weatherized. The state value of 78% AFUE for all residential oil-fired furnaces is not allowed under federal law for non-weatherized oil furnaces.

Also, footnote f of the table only applies to unit heaters, not to furnaces.

Thank you for your consideration of my comments.

Steve Rosenstock, P.E.
 Senior Manager, Customer Technical Solutions
 Edison Electric Institute
 701 Pennsylvania Avenue NW
 Washington, DC 20004-2696
srosenstock@eei.org
 202-508-5465 (work)