

DOCKETED

Docket Number:	17-AAER-06
Project Title:	Commercial and Industrial Fans & Blowers
TN #:	224110
Document Title:	Extension Request for Written Comments to Draft Staff Report
Description:	N/A
Filer:	System
Organization:	Michael Ivanovich/AMCA
Submitter Role:	Public
Submission Date:	7/10/2018 9:18:44 AM
Docketed Date:	7/10/2018

Comment Received From: Michael Ivanovich
Submitted On: 7/10/2018
Docket Number: 17-AAER-06

Extension Request for Written Comments to Draft Staff Report

Additional submitted attachment is included below.



AIR MOVEMENT AND CONTROL ASSOCIATION INTERNATIONAL, INC.
30 West University Drive | Arlington Heights, Illinois 60004 U.S.A.
+1 (847) 394-0150 | www.amca.org

The International Authority on Air System Components Since 1917

Mr. Alejandro Galdamez
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

Docket Unit, MS-4
Docket No. 17-AAER-06

Dear Mr. Galdamez:

AMCA International requests a 60-day extension of the comment deadline for the draft staff report for the Title 20 efficiency regulation for commercial and industrial fans and blowers.

The staff report is the first-ever draft of an appliance regulation covering these products in the USA, and AMCA International and its members are directly and deeply affected by it. We acknowledge the considerable work CEC has put forth to review and incorporate the body of work from the U.S. Department of Energy rulemaking, which was shelved in 2016, and the work that AMCA and other parties have completed since. We are encouraged that much of the report draws upon the Joint Recommendation submitted by AMCA International, energy-efficiency advocate organizations, and the California Investor Owned Utilities.

AMCA staff and members are still reviewing the report. Because AMCA is a consensus-based manufacturers association, staff from individual member companies must provide their review findings through oversight committees. These actions have been hampered by the Fourth of July holiday period, the summer vacations of many staff and members, and a week-long mid-July three-year planning meeting.

AMCA International has been enthusiastically collaborating with the CEC, efficiency-advocacy organizations, and the California Investor Owned Utilities. We will continue to support the Title 20 regulation.

However, as experts in fan engineering and manufacturing, we attest that more time is needed to give the draft staff report the detailed analysis necessary for providing supporting comments and comments that seek clarification or correction. We believe a 60-day extension is merited by the complexity of regulating fans – for example, the testing and labeling requirements; the first regulatory use of the FEI metric; and the first-ever regulation of commercial and industrial fans.

Thank you very much,

Michael Ivanovich
Senior Director, Industry Relations
mivanovich@amca.org