

DOCKETED

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Twin City Fan Comments

Additional submitted attachment is included below.



28 September, 2018

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 17-AAER-06
1516 Ninth Street
Sacramento, CA 95814-5512

To: Mr. Alejandro Galdamez/California Energy Commission

From: Twin City Fan Companies, LTD

Subj: Docket NO. 17-AAER-06 – Commercial and Industrial Fans & Blowers

Twin City Fan Company manufactures a full spectrum of air moving equipment. The list of applications that utilize our products is very extensive, and ranges from heavy duty custom fans for industrial applications to custom OEM fans. As such, one of the strengths of Twin City Fan Company is that we have technical solutions for most applications. The success of Twin City Fan Company has been providing a technologically feasible fan for the most economically justified price.

The following comments are submitted by Twin City Fan Company in response to Proposed Standard Draft Staff Report. As such, these comments are to assist the CEC in its rule making process.

AMCA Standards, FEI, and FEP metrics – Twin City Fan Companies supports the AMCA positions regarding the usage of AMCA standards in the CEC regulations wherever applicable. Considerable work has been done in the association in concert with energy advocates, industry and stakeholders.

Fan Laws – In the case where the Energy Commission is seeking more information on the implementation of fan laws for testing and/or reporting, we strongly suggest that they fan laws be used in accordance with all current Air Movement and Controls Association standards. For as long as the industry has been in existence, fan laws have been used for testing, and reporting purposes. The accuracy and acceptance of this practice make it impossible to operate otherwise.

Embedded fans - In the case where the Energy Commission is seeking more information on the definition, and scope, Twin City Fan Companies encourages the Energy Commission to realize that the majority of fans are embedded into a piece of equipment or system; generally speaking, all fans are embedded. For example, industrial fans are inside of dust collection systems, boiler systems, drying systems, and many industrial ventilation applications. Since this is the case, the definition of embeddedness becomes critical to this regulation. Twin City Fan Companies believes that fans that current have their energy efficiency standards captured in federally regulated equipment is a logical exclusionary list, and the scope of this regulation should not



Twin City Fan Companies, Ltd.

Worldwide Designers & Manufacturers of Air Moving Equipment

include those fans as they are already accounted for. All other fans, unless for safety, emergency, or special purposes, should be considered included. Air curtains should not be included in this regulation.

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