DOCKETED	
Docket Number:	19-BSTD-01
Project Title:	Draft 2019 Alternative Calculation Method Reference Manuals and Compliance Software Tools
TN #:	227269
Document Title:	Erik Kolderup Comments Highrise multifamily standard HVAC system
Description:	N/A
Filer:	System
Organization:	Erik Kolderup
Submitter Role:	Public
Submission Date:	3/5/2019 11:53:27 AM
Docketed Date:	3/5/2019

Comment Received From: Erik Kolderup

Submitted On: 3/5/2019 Docket Number: 19-BSTD-01

Highrise multifamily standard HVAC system

In order for California to meet aggressive reduction goals for carbon emissions, it is important to allow and encourage the development of all electric buildings without gas heating. The current HVAC System Map in Table 2 on page 5-2 creates a barrier to compliance for all-electric buildings that follow the performance path for compliance.

In the current draft, the standard system for MF buildings of seven or floors is a single zone DX air conditioner with gas furnace heating. This system type would be extremely rare. A more appropriate baseline would include heat pump heating.

For buildings of 8 stories or greater, the standard system is a four-pipe fan coil with a gas boiler for heat. While this is currently a common system type, the use of a gas boiler in the baseline makes it hard for an all electric building to comply when using TDV as a compliance metric. Heat pumps are becoming more common in this application and would make a reasonable baseline.