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DOAS as an alternate prescriptive requirement

ETC supports the addition of prescriptive provisions for systems that use dedicated ventilation systems and decoupled primary heating and cooling systems. Currently, compliance of these systems can only be demonstrated following the whole building performance path. This supports the addition of prescriptive requirements which will reduce documentation and review requirements and allow more design flexibility, especially for smaller buildings. Additionally, these new prescriptive provisions will allow the retrofit of existing buildings of HVAC systems without the need to consider the performance of other building systems, such as lighting and building envelope, that are required under current requirements. We understand that there are concerns about increased energy use due to dedicated ventilation systems not including 100% outdoor air economizers. However, the analysis in the CASE report shows that TDV energy for common applications of these system types is lower than typical designs of more conventional systems such as single zone rooftop equipment and VAV systems.