

<b>DOCKETED</b>	
<b>Docket Number:</b>	19-BSTD-03
<b>Project Title:</b>	2022 Energy Code Pre-Rulemaking
<b>TN #:</b>	235386
<b>Document Title:</b>	Northwest Energy Efficiency Alliance Comments - NEEA Title 24 CASE Report 2022-NR-HVAC4-D-Nonresidential HVAC Controls Comment Letter 10 21 2020
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Northwest Energy Efficiency Alliance
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	10/21/2020 4:35:36 PM
<b>Docketed Date:</b>	10/22/2020

*Comment Received From: Northwest Energy Efficiency Alliance*  
*Submitted On: 10/21/2020*  
*Docket Number: 19-BSTD-03*

**NEEA Title 24 CASE Report 2022-NR-HVAC4-D-Nonresidential  
HVAC Controls Comment Letter 10 21 2020**

This comment letter (attached) is in response Nonresidential HVAC Controls October 7th Pre-Rule Making Workshop.

thanks,

*Additional submitted attachment is included below.*

October 21<sup>st</sup>, 2020  
Via Electronic Mail



Commissioners  
California Energy Commission  
2022 Energy Code Pre-Rulemaking  
[info@title24stakeholders.com](mailto:info@title24stakeholders.com)

Re: Comments regarding CASE Report 2022-NR-HVAC4-D-Nonresidential HVAC Controls

Dear Commissioners,

Northwest Energy Efficiency Alliance (NEEA) submits the following comments in response to the California Energy Commission (CEC) CASE Report 2022-NR-HVAC4-D-Nonresidential HVAC Controls.

NEEA is a non-profit organization working to encourage the development and adoption of energy-efficient products, practices and services. Funded by the regional utilities, NEEA is a collaboration of 140 utilities and efficiency organizations working together to advance energy efficiency in the Northwest on behalf of more than 13 million consumers. This unique partnership has helped make the Northwest region a national leader in energy efficiency.

We appreciate CEC's effort to seek information from the public and strongly support the CEC's non-residential HVAC controls enhancement proposal for the 2022 Title 24 CA Building Energy Efficiency Standard. This proposal has elements from the Washington State Energy Code (WSEC) 2015 that has been adopted for more than 4 years. The proposal has a solid engineering foundation and straightforward and enforceable code provisions to achieve high code compliance. We note these code provisions are prescriptive and provide an optional pathway to comply, building in flexibility for designers to provide energy efficient HVAC systems with less burden. We applaud the CEC in providing innovative code approaches to achieve California's energy efficiency goals. We look forward to providing further comments as this code proposal is developed in CEC's process.

Thank you for considering our comments.

Sincerely,

A handwritten signature in black ink that reads "Louis Starr".



Louis Starr, P.E.  
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