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*Comment Received From: Tye Buckley
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CEC Steam Trap Monitoring Response

Additional submitted attachment is included below.

California Energy Commission

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Ref: California Energy Code Pre-Rulemaking Response (Docket #: 19-BSTD-03)

11-10-20

Dear Halie Bucaneg,

My name is Tye Buckley and I am the Director for Product Management at Spirax Sarco US. I am responsible for our US based product development which encompasses wireless and wired steam trap monitoring devices and solutions. Along with one of my colleagues, Mark McGinn (West Regional Sales Manager), I have been assisting the AESC Inc. Team in providing data and reviewing the proposed language and figures included in the: 2022-NR-COV-PROC3-F, Nonresidential, October 2020 FINAL CASE REPORT.

Questions regarding steam trap monitoring and savings from failed traps:

- The energy savings based on steam trap monitoring are clear in the report and we support the assumptions.
- The main question or challenge from Spirax Sarco is the total trap population listed in the Final Case Report as well as the CEC Workshop presentation. The CEC workshop listed 3,200 industrial boilers state-wide, which would require only 3 traps per boiler to get to the assumed 9,860 total steam traps. Based on our market share info as well as a general estimate of 25 traps per boiler, we estimate the total trap population for California to be closer to 80,000 or 90,000.
- For the language in the proposal – is wireless or wired trap monitoring to be included or added to all new trap installation or replacements within the given pressure and load parameters or just to traps supporting new equipment?

Questions regarding steam trap strainer and blow-off valve assembly:

- For the language in the proposal – similar to steam traps, are strainers to be included or added to all trap replacements within the given pressure and load parameters or just to traps supporting new equipment?
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Yours sincerely



Tye Buckley
Director, Product Management and Projects
Spirax Sarco US