

DOCKETED	
Docket Number:	19-BSTD-03
Project Title:	2022 Energy Code Pre-Rulemaking
TN #:	237089
Document Title:	Scott Wayland Comments - Delete new DOAS Economizer Exception
Description:	N/A
Filer:	System
Organization:	Scott Wayland
Submitter Role:	Public
Submission Date:	3/9/2021 4:37:47 PM
Docketed Date:	3/9/2021

Comment Received From: Scott Wayland
Submitted On: 3/9/2021
Docket Number: 19-BSTD-03

Delete new DOAS Economizer Exception

The revised exception to 140.4(e)1 that allows systems to be exempt from the economizer requirement should be revised. The way it's written suggests that any size system that uses DOAS can avoid provisions for free cooling.

In most California climate zones, this would result in significant loss in energy saving opportunities. It is a misnomer to assume that DOAS systems are efficient, or that they all have energy recovery, or modulation or airflow.

If the exception is written to only provide exception to systems smaller than a particular size, because the threshold for economizers is being dropped from 54 MBH to 33 MBH, then please address those thresholds appropriately.

It should be pointed out that many systems that use DOAS also use split DX technologies that may already meet the performance exception.

The proposed edit regarding DOAS exceptions for economizers does not meet the intent of the Warren-Alquist Act.