

**DOCKETED**

<b>Docket Number:</b>	19-BSTD-03
<b>Project Title:</b>	2022 Energy Code Pre-Rulemaking
<b>TN #:</b>	237285
<b>Document Title:</b>	Armin Hauer Comments - efficacy is cfm-per-watt
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Armin Hauer
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	3/24/2021 5:28:14 AM
<b>Docketed Date:</b>	3/24/2021

*Comment Received From: Armin Hauer*  
*Submitted On: 3/24/2021*  
*Docket Number: 19-BSTD-03*

### **efficacy is cfm-per-watt**

Ventilation requirements in TN # 236876 inverted the term "efficacy". If a limit is expressed in W/cfm then the quantity is not efficacy but SFP (specific fan power). Please compare against Energy Star, HVI 916, HVI 920, AMCA 230, and AMCA 211 where fan efficacy is always expressed in cfm/W. In other words, a higher efficacy means a better system.

Thank you.