

**DOCKETED**

<b>Docket Number:</b>	19-BSTD-03
<b>Project Title:</b>	2022 Energy Code Pre-Rulemaking
<b>TN #:</b>	237310
<b>Document Title:</b>	Fard Engineers Comments - Reply to Geary Pacific wrt MiniSplits, Ventilation & Filtration
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Fard Engineers
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	3/25/2021 4:47:02 PM
<b>Docketed Date:</b>	3/25/2021

*Comment Received From: Fard Engineers  
Submitted On: 3/25/2021  
Docket Number: 19-BSTD-03*

**Reply to Geary Pacific wrt MiniSplits, Ventilation & Filtration**

*Additional submitted attachment is included below.*

**From:** [Avery Colter](#)  
**To:** [Energy - Docket Optical System](#)  
**Subject:** 19-BSTD-03: Reply to Geary Pacific wrt MiniSplits, Ventilation & Filtration  
**Date:** Thursday, March 25, 2021 4:15:27 PM

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To Geary Pacific:

The relevant language says that MERV 13 filtration requirements are for air handlers providing heated or cooled air through ducts in excess of ten lineal feet. Ductless and very-short-ducted VRF/minisplit heads are therefore not themselves subject to MERV 13 requirements unless outside air is being propelled in directly by them, which is not usually the case. The usual case is that outside air will be supplied by separate means, and if such means are supply-only or balanced ventilators, then it is *these* system which are subject to the MERV 13 filter requirement.

**Avery Ray Colter**

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