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**AMCA International Comments - 15-day Express Terms**

*Additional submitted attachment is included below.*



## AMCA International

**Air Movement and Control Association International, Inc.**  
The International Authority on Air System Components Since 1917

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July 29, 2021

California Energy Commission  
Docket Office, MS-4  
RE: Docket No. 21-BSTD-01  
1516 9th Street, MS-4  
Sacramento, CA 95814-5512

### **AMCA International Comments RE: Proposed 15-Day Express Terms 2022 Energy Code - (Docket No. 21-BSTD-01), Section 120.10 Mandatory Requirements for Fans**

Dear Commissioner and Staff:

Air Movement and Control Association (AMCA) International<sup>1</sup> thanks the Commission for advancing the 2022 Energy Code's fan-efficiency provision, which uses the Fan Energy Index (FEI) metric.

AMCA advocates for the transition to FEI as the fan-efficiency metric in state energy codes. Formalized in ANSI/AMCA Standard 208-18, *Calculation of the Fan Energy Index*, FEI considers the effects of motors and drives in fan systems and helps right-size fan systems for the air-distribution systems and conditions they will operate in. FEI also eliminates the sizing window required by the Fan Efficiency Grade (FEG) metric, which is applied at design and difficult to enforce.

AMCA continuously creates and updates resources to assist with adoption, application, and enforcement of FEI. These resources can be found at [www.amca.org/FEI](http://www.amca.org/FEI).

AMCA commends the path California is taking to require third-party-verified FEI ratings that could be provided using manufacturer software. FEI ratings most often are provided by manufacturer software because of the myriad fan/motor/drive combinations. Hyperlinks to AMCA-certified software from a wide variety of manufacturers can be found at [www.amca.org/find-FEI](http://www.amca.org/find-FEI).

AMCA notes that FEI is the fan-efficiency metric for predominantly stand-alone fan applications in:

- 2021 International Energy Conservation Code (IECC)
- 2021 International Green Construction Code (IgCC)

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<sup>1</sup> AMCA International is a not-for-profit association of manufacturers of fans, dampers, louvers, air curtains, and other air-system components for commercial HVAC, industrial-process, and power-generation applications. With programs such as certified ratings, laboratory accreditation, verification of compliance, and international standards development, AMCA's mission is to advance the knowledge of air systems and uphold industry integrity on behalf of more than 400 member companies worldwide.

- ANSI/ASHRAE/ICC/USGBC/IES 189.1-2020, *Standard for the Design of High-Performance Green Buildings Except Low-Rise Residential Buildings*
- ANSI/ASHRAE/IES 90.1-2019, *Energy Standard for Buildings Except Low-Rise Residential Buildings*

Florida became the first state to adopt FEI with the seventh (2020) edition of *Florida Building Code: Energy Conservation*, which adopted the IECC 2021 fan-efficiency provision while adopting the 2018 IECC commercial code. Oregon followed with the 2021 Oregon Energy Efficiency Specialty Code, which is based on ANSI/ASHRAE/IES 90.1-2019.

With the language found in the 15-Day Express Terms 2022 Energy Code, California is on track to become the first state to use FEI in a state energy code that does not reference a model code. This required considerable research by the CASE team, as published in the September 2020 final report *Air Distribution: High Performance Ducts and Fan Systems*.

AMCA also notes that FEI is being considered as the regulatory metric for a CEC Title 20 efficiency regulation for commercial and industrial fans and blowers. Having harmony between the Title 24 and Title 20 fan-efficiency metrics benefits consumers and industry and will help accelerate energy and carbon savings, which will benefit the environment.

Please contact either of us with any questions related to these comments. On behalf of AMCA International and its member companies, we would like to thank the Commission for the opportunity to comment on the 15-Day Express Terms 2022 Energy Code.

Respectfully,

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