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Supplementary Comment - AMCA International

Please see attachment for one supplementary AMCA comment. Thank you for your consideration.

Additional submitted attachment is included below.



July 26, 2022

Mr. Alejandro Galdamez, PE
Commissioner
California Energy Commission
Docket Unit
Re: Docket No. 22-AAER-01
715 P Street, MS-1
Sacramento, CA 95814-5512

(submitted electronically to Docket 22-AAER-01)

Re: Supplementary AMCA International Comment in Response to California Energy Commission's Proposed Regulatory Adoption of Efficiency Standards and Test Procedures for Commercial and Industrial Fans and Blowers (15-Day Language) [*Docket Number 22-AAER-01; TN#243977*]

Dear Mr. Galdamez:

Air Movement and Control Association (AMCA) International respectfully submits this supplementary comment in response to the California Energy Commission (CEC) Notice of Proposed Action published July 11, 2022, for the Title 20 commercial-and-industrial-fans-and-blowers (CIFB) regulation.

AMCA also comments on the use of SCFM for airflow reporting. AMCA Standards 210 and 214 use a method of converting data to standard air density that is different from standard cubic feet per minute (SCFM). In a general simplified summary, the method of conversion is to use actual cubic feet per minute (ACFM) while converting pressure and power to standard air density conditions. Thus, AMCA recommends that CEC remove all reference to SCFM as the AMCA Standards dictate the conversion method to standard air density, and recommends instead that CEC simply note that all reporting is to standard air density per AMCA Standards 210 and 214.

Thank you for consideration of this supplementary comment. If you have any questions regarding this submission, please do not hesitate to contact me.

Respectfully submitted,

Michael Ivanovich
Senior Director, Global Affairs
Air Movement and Control Association International