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*Comment Received From: Beth Braddy
Submitted On: 8/21/2023
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Trane Technologies Comment - Docket 22-BSTD-01

Additional submitted attachment is included below.



August 21, 2023

California Energy Commission
Docket Unit, MS-4
Docket No. 22-BSTD-01
715 P Street
Sacramento, CA 95814

Re: Title 24 and ASHRAE Guideline 36 – Docket No. 22-BSTD-01

Dear Commissioners and CEC Staff,

Thank you for the opportunity to comment on Docket No. 22-BSTD-01 regarding the proposal to add prescriptive requirements around controller logic and ASHRAE Guideline 36 as reference in Title 24-2025.

Trane Technologies is a world leader in creating comfortable, sustainable, and efficient environments and leading our industry in sustainability practices. Through our strategic brands Trane and Thermo King, and our portfolio of environmentally responsible products and services, we bring efficient and sustainable climate solutions to buildings, homes and transportation. Our bold 2030 Sustainability Commitments are central to our business strategy and include a pledge to reduce our customers' carbon emissions by one gigaton (2% of the world's annual emissions) and to bring our own operations to carbon neutral. Our ambitious greenhouse gas (GHG) emissions reduction targets which have been verified by the [Science Based Targets Initiative \(SBTi\)](#) challenge us to lead by example, collaborate with our customers to drive sustainable innovation and create opportunity for all in our workplace and our communities.

In reviewing the proposed language in 140.4(r), we are concerned that the intended scope of the usage of ASHRAE Guideline 36 control sequences is not clear as written. ASHRAE Guideline 36 does not include equipment control sequences for air handling equipment with DX cooling or heating (i.e. packaged or split system equipment). Therefore, equipment control sequences are not applicable to this equipment and would not be present in the programming library. Only when this equipment is used as part of a VAV system with building controls and VAV boxes would ASHRAE Guideline 36 trim and respond methodology for duct pressure and discharge air temperature setpoint reset be applicable. We recommend adding an additional exception to the proposed language for this section (exception highlighted in yellow below).

(r) DDC Controller Logic Using ASHRAE Guideline 36. HVAC systems with DDC shall use controller logic originating from a programming library based on sequences of operation from ASHRAE Guideline 36 in accordance with Subsections 140.4(r)1 through 140.4(r)2. 1. Requirement applies to the entirety or portions of equipment control for configurations included in the programming library.



2. The programming library shall be certified by the Energy Commission as meeting the requirements of JAX.X.

Exception 1 to Section 140.4(r): Logic from the certified programming library may be modified to suit application-specific needs that are not supported by Guideline 36 sequences.

Exception 2 to Section 140.4(r): Systems serving healthcare facilities.

Exception 3 to Section 140.4(r): Factory mounted controllers on packaged or split system air handling equipment applied in stand-alone operation or connected to a building automation system.

Thank you for the opportunity to provide comments on this proposed update to Title 24-2025. Please contact me if you have any questions about our submission.

Sincerely,

Beth Braddy

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