

DOCKETED

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CA Title 24 proposal - BAC comments 5-7-2024

Additional submitted attachment is included below.



May 7, 2024

CEC Docket 24-BSTD-01

Dear CEC Staff,

We are pleased to submit comments on the 45-Day Express Terms to supplement our comments previously sent on November 17, 2023, September 5, 2023, and July 28, 2023, along with our response to the Final CASE Report dated August 2023 and the Pre-Rulemaking Workshop held on August 23, 2023.

Our comments on the cooling tower-related changes for 2025 are as follows:

- Cooling Tower Efficiency:
 - We appreciate the reduction in the required minimum efficiency for axial fan open circuit cooling towers utilized on water cooled chiller plants over 300 tons from 120 gpm/hp to 80 gpm/hp. This modification to the prescriptive cooling tower efficiency in Sections 140.4(h)5 and 170.2(c)4Fv helps minimize many of our concerns as listed in our memo to Docket 22-BSTD-01 dated July 18, 2023, over the significant increases originally proposed. However, we would suggest that further study of the minimum efficiency values by climate zone be performed in the future to evaluate if additional reductions are warranted. Our concern is a result of flawed control strategies for cooling towers contained in many energy modeling programs which have potential to overestimate fan energy usage.
- Blowdown Controls:
 - We are supportive of the final proposal regarding blowdown controls, including use of conductivity controls, setting of target cycles of concentration, and overflow alarms, especially as modified by the CA Utility CASE Team and Compliance Improvement Team Comments on the 45-Day Express Terms posted to the Docket on May 3, 2024. Note that as the measure moves through the CEC process, we may provide additional comments in the future.

Thank you for considering our comments and please do not hesitate to reach out with questions.

Sincerely,

Bill McQuade, P.E., LEED® AP, FASHRAE
Vice President of Government Affairs and Sustainability

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