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45 Day Language JA18 Guideline 36

Additional submitted attachment is included below.

MEMORANDUM

May 1, 2024

California Energy Commission

Docket No. 24-BSTD-01

TN# 255315-3

Re: 2025 Reference Appendices for the 2025 Building Energy Efficiency Standards, Express Terms, 45-Day Language

Dear Commissioners and CEC Staff,

Thank you for the opportunity to comment on the recently published 45-day express terms for Title 24-2025. We are pleased to see the requirement of using control sequences from ASHRAE Guideline 36.

Our question is on section JA.18.5 Declaration. The earlier CASE report listed "Company, Product Line, and Version Number of all Libraries being certified" but the 45-day language changed it to be "Company, Model Name and Number of all devices being certified". This is a change going from certifying a programming library (driver) to certifying a controller or control device (vessel). This change can lead to issues and confusion down the road.

There are equipment controllers that are pre-programmed in the factory and shipped together with the equipment (small rooftop units and some terminal units, for example), and control contractors can only configure them by accessing I/O points but not changing the programming. These controllers are listed under "*Exception 1 to Section 140.4(r)3: Non-programmable (configurable-only) controllers for zone terminal units shall follow applicable ASHRAE Guideline 36 zone sequences referenced in JA18 Table 18.3-1 but are not subject to programming library requirement in Section 140.4(r)3.*"

There are also a lot of field controllers that are furnished and installed by control contractors during construction. Control contractors will need to configure, program, and customize these controllers. It is our understanding that CEC's intent is to ensure the correct Guideline 36 programming in these controllers is completed and commissioned in the field. Certifying these field controllers does not achieve the purpose or warrant that the Guideline 36 certified programming library will be loaded, customized, and tested correctly in the field.



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In general, our comment is certification of a programming library need to be decoupled from certification of specific controllers or devices, and it will be more beneficial if the Guideline 36 certification targets control sequence programming vs. pre-programmed controllers.

Please let us know if you have any questions and we would be happy to discuss more.

Sincerely

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