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ASHRAE Supplemental Letter - Docket 24-BSTD-01 2025 Energy Code

Additional submitted attachment is included below.



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M. Dennis Knight
2024-2025 ASHRAE President

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September 6, 2024

Mr. David Hochschild
Chair
California Energy Commission
715 P Street
Sacramento, CA 95814

Letter sent via email to: docket@energy.ca.gov

Re: Docket 24-BSTD-01: 2025 Energy Code

Dear Chair Hochschild:

ASHRAE is writing to clarify the comments it submitted on September 3, 2024 concerning the August 15-day language for the 2025 California Energy Code Rulemaking. ASHRAE appreciates the California Energy Commission (CEC) conducting additional analysis to address stakeholder concerns surrounding Section 140.4(a)3. As ASHRAE communicated in its May 10, 2024 letter, the requirements in this section were overly prescriptive and would unnecessarily constrain design options by preventing the use of system designs and technology options that may be a better fit for specific types of buildings such as offices and school buildings. While we appreciate the additional work that the CEC put into the analysis to revise this section, we remain concerned that due consideration has not been given to all system types and additional analysis is needed. We also want to make clear that ASHRAE does not oppose any specific system or configuration, including any named in the prescriptive requirements.

Through this supplemental letter, ASHRAE would like to clarify that the application of ASHRAE Standard 15-2022, *Safety Standard for Refrigeration Systems*, specifically Section 7.6, addresses safety requirements for direct-expansion (DX) refrigeration systems using low-flammability (A2L) refrigerants. ASHRAE Standard 15-2022, *Safety Standard for Refrigeration Systems*, specifically Section 7.6 leans heavily on the use of refrigerant detection systems to enable operation of leak mitigation strategies, such as mechanical ventilation or exhaust systems where those mitigation measures are employed. The “potential safety issues” mentioned in our September 3 letter would be addressed by ASHRAE Standard 15-2022, and our concern was that the CEC had not fully assessed the additional costs and operational complexities of VRF and other DX systems using these refrigerants if only R410A systems were analyzed, particularly in

larger or more complex installations. ASHRAE's comments in our September 3 letter were intended to express concerns about the challenges that the proposed prescriptive requirements in Section 140.4(a)3 would pose for VRF systems, not concerns about the technology itself or systems using A2L refrigerants.

In summary, ASHRAE appreciates the broader language the CEC has contemplated, but does not support a prescriptive path that is overly limiting. ASHRAE stands ready to provide technical assistance to support a more thorough analysis of any code updates before they are finalized. Please let us know if you would like to be connected with our technical experts by emailing GovAffairs@ashrae.org. Thank you for your work to improve building performance and improve the lives of California residents.

Sincerely,

A handwritten signature in blue ink that reads "M. Dennis Knight". The signature is written in a cursive style with a light blue background behind it.

M. Dennis Knight
2024-2025 ASHRAE President