

Carrier Corporation
Carrier World Headquarters
One Carrier Place
PO Box 4015
Farmington, CT 06034-4015
860.674.3000



Carrier

A United Technologies Company

December 17, 2007

California Energy Commission
Attention: Docket No. 07-BSTD-1
Dockets Office
1516 Ninth Street, MS-4
Sacramento, CA 95814

DOCKET 07-BSTD-1	
DATE	DEC 17 2007
RECD.	DEC 21 2007

To Whom It May Concern:

Carrier Corporation appreciates this opportunity to comment on the proposed revisions to the California Residential Building Standards. As the world's largest heating, air-conditioning and refrigeration manufacturer, we are particularly interested in those portions of the proposed regulation that pertain to the proposed air handler airflow and power consumption requirement.

As we have indicated in discussions with staff, Carrier believes that the proposed prescriptive field-testing may be more problematic than currently envisioned. We suggest that the Commission consider linking implementation to a pilot program to work through field-testing issues.

Carrier continues to believe that the single greatest influence on duct system efficiency is duct static pressure, including the air filter. We understand that the Commission desires to establish a W/cfm standard for furnace fan efficiency in this rulemaking, however we suggest that duct static pressure standards be considered in future rulemakings as a more effective method of improving air moving efficiency.

Thank you for considering these comments. Carrier will continue to work with CEC staff and consultants, as the Commission considers appropriate building standard regulations.

Sincerely,

Neil W. Beup

Manager, External and Regulatory Affairs