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10-BSTD-01

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September 6, 2011

California Energy Commission (CEC)

Re: AHRI Comments on August 17, 2011 Condenser Water Supply Temperature (CWST) Reset Controls Presentation (Docket Number 10-BSTD-01; "August 17, 2011 Staff Workshop – 2013 Building Energy Efficiency Standards")

Dear CEC Staff:

The Air-Conditioning, Heating and Refrigeration Institute (AHRI) is the trade association representing manufacturers of heating, cooling, water heating, and commercial refrigeration equipment including manufacturers of commercial HVAC pumps. More than 300 members strong, AHRI is an internationally recognized advocate for the industry, and develops standards for and certifies the performance of many of the products manufactured by our members. In North America, the annual output of the HVACR industry is worth more than \$20 billion. In the United States alone, our members employ approximately 130,000 people, and support some 800,000 dealers, contractors and technicians.

We have reviewed the CWST reset controls presentation that was discussed at the CEC staff workshop on August 17, 2011. Although we mostly support the draft code language on CWST reset controls proposed during the workshop, we recommend that CEC add an exception for heat recovery applications. Temperature reset cannot be accomplished in instances where heat is being recovered from the condenser. AHRI suggests that the exception read as follows:

Exception – When the design of a specific project would not produce any energy savings or the application/system would not allow for a reduction in condenser water temperatures (i.e. heat recovery applications). Design engineer would be required to provide energy usage data demonstrating no savings in order to obtain this exception.

AHRI appreciates the opportunity to provide these comments. If you have any questions regarding this submission, please do not hesitate to contact me.

Sincerely,

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