

October 27, 2011

Ron Yasny
Contract Manager High Performance Buildings
and Standards Development Office
California Energy Commission
1516 Ninth Street, MS-37
Sacramento, CA 95814



Re: Public comments on draft language for 2013 Building Energy Efficiency Standards
(October 14 Workshop), docket number 10-BSTD-01

Dear Mr. Yasny:

The following are my comments on the draft proposed language for **Section 150.1**. There will be comments to follow on other sections, under separate cover.

Thank you for your consideration and the hard work of CEC staff on this important topic.

Sincerely,

Russell King, P.E.
V.P. Technical Services
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DOCKET	
10-BSTD-01	
DATE	Oct. 27 2011
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150.1(c) . . .

7. Space heating and space cooling. . . .

A. When refrigerant charge measurement or charge indicator display is shown as required by, ducted split system central air conditioners and ducted split system heat pumps shall:

- i. Have temperature measurement access holes (TMAH) **installed according to the specifications in Reference Residential Appendix RA3.2.2.2.2; saturation pressure measurement sensors (SPMS) that meet the requirements of Reference Joint Appendix JA6 that are installed permanently by the air conditioning equipment manufacturer or according to the air conditioning equipment manufacturer specifications to provide digital indication of the condenser saturation pressure and the evaporator saturation pressure; and proper refrigerant charge confirmed through field verification and diagnostic testing in accordance with applicable procedures set forth in Reference Residential Appendix RA3.2, or RA1; or . . .**

The intent appears to be to have any house that complies using the prescriptive approach have the SPMS's. These are measuring devices that are an alternative to using normal refrigerant gauges. They are not an energy feature. Since both SPMS's and gauges are an acceptable method under RA3.2, I do not feel it is necessary to require them simply because of the compliance method. If gauges are adequate under the performance method, why aren't they adequate for the prescriptive approach?

150.1(c) . . .

7. Space heating and space cooling. . . .

B. For systems other than ducted split system central air conditioners and ducted split system heat pumps, when refrigerant charge measurement or charge indicator display is shown as required by Table 150.1-C, and when a space conditioning system is an air conditioner or heat pump that cannot meet the requirements of 150.1(c)7Ai or 150.1(c)7Aii, the space conditioning system **installer** shall submit Installation Certificate documentation that certifies the system has correct refrigerant charge as determined in accordance with the weigh-in charging method specified in Reference Residential Appendix RA3.2.3. HERS field verification and diagnostic testing of the refrigerant charge for these systems is not required.

Insert the word "installer" as shown above.
