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| DOCKET | |
| 10-BSTD-01 | |
| DATE | DEC 22 2011 |
| RECD. | DEC 22 2011 |

December 22, 2011

California Energy Commission (CEC)

Re: October 14, 2011 Residential Staff Workshop - 2013 Building Energy Efficiency Standards (AHRI Comments on Proposed Code Language With Respect to Air Filtration)

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. Over 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 some concerns with respect to the measures discussed at the October 14, 2011 CEC staff workshop. We appreciate the opportunity to provide these comments and urge CEC to reconsider its proposed language in §150(m)12. More specifically, the proposal states a pressure drop requirement of 0.1 in H₂O but does not account for dust holding capacity; this is inappropriate and would lead to an increase the energy consumption of the HVAC system since system pressure is not addressed as the filter gets loaded over a period of time. Therefore, CEC should consider revising the pressure drop and air filter product labeling requirements in the air filtration section.

A filter with a MERV 6 rating will at least provide a basic level of protection to the equipment and will provide minor improvements to the level of indoor air quality; however, the requirement to have a maximum clean filter pressure drop below 0.1 in H₂O at the designed airflow is unreasonable because the technology for filters with a rating greater or equal to MERV 6 with such a low initial pressure drop is practically non-existent.

The requirement to label the filters with the test results places a heavy burden on manufacturers, as these filters are often sold across the US and in Canada, and distribution is not always split by region. Having the requirement to place specific information on the filter for a single state is inefficient and may become confusing if other states adopt similar requirements but with different labeling requirements.

AHRI proposes the following modifications to help improve on the proposed code language:

- Instead of requiring an initial pressure drop in which technology does not currently exist, require an initial pressure drop of 0.35". Such a requirement is in the realm of existing products that meet the MERV 6 minimum. Additionally, the requirement will improve energy conservation by preventing the use of more restrictive filters that could adversely impact system performance.
- Instead of requiring the test results to be printed on the product, the product should be labeled to refer users to the manufacturer's website where the proposed labeling requirements will be provided. We feel that this suggested process will provide a better value to the homeowner because the data on the website would be more legible. The air filter product labeling specified in §150(m)12D is onerous for the industry. The website would help meet the labeling objective whilst placing a minimal burden on manufacturers.

We feel that the modifications mentioned above will make the standard less burdensome for the industry while ensuring that CEC's energy efficiency objectives are met. Once again, we appreciate the opportunity to comment on the code language and provide you with our alternate proposal. If you have any questions or wish to discuss this further, please do not hesitate to call me at (703) 600-0383.

Sincerely,



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