

DOCKET

10-BSTD-01

DATE Jan 24 2012

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DATE: January 24, 2012
TO: California Energy Commission
RE: Docket number 10-BSTD-01
Building Energy Efficiency Standards

I am a HERS rater and wish to make a comment regarding the proposed 2013 Title 24 Standards. Specifically, regarding the use of a flow hood as an acceptable method of airflow verification. I understand that there is a proposal to make this go away. I encourage you to reconsider for the following reason: We have tested hundreds of HVAC systems in both new construction and alteration scenarios. Our experience shows that, due to variables like duct design and installation; register type and location; furnace location and type; whether or not an adequate heat load calculation was performed; inconsistencies with the Tru-Flow Grid results; and blower motor type; we find it necessary from time to time to employ the use of our flow hood to verify adequate airflow. In fact, were it not for the flow hood method, there have been instances where we could not have passed the system. This is particularly true for existing system alterations where only the condenser and coil are changed out, such as a home insurance claim.

Again, please consider retaining the use of the flow hood as an approved airflow verification method.

Thank you for your time,

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