RESEARCH PRODUCTS CORPORATION

June 6, 2014

California Energy Commission (CEC)
Dockets Office, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512
docket@energy.ca.gov

Re: Comments – 2014 Appliance Efficiency Pre-Rulemaking (Title 20 Proposal on Air Filter Labeling) [Docket Number 14-AAER-1]

Dear CEC Staff:

These comments are in response to the California Energy Commission (CEC) appliance efficiency pre-rulemaking proposal on air filter labeling presented during the May 6th public workshop. Research Products Corporation is a leading manufacturer of high-efficiency whole house air cleaners, sold under the Aprilaire brand. We appreciate the opportunity to provide comments on possible amendments to the Appliance Efficiency Regulations (Title 20, Code of Regulations, Sections 1601 through Section 1608).

After reviewing the CEC document, our assessment is that it is not possible for many Air Cleaners to comply with the proposed Title 20 label shown below.

MERV	Airflow Rate (CFM)	400	800	1200	1600	2000*	*Max Rated Airflow
[value]	Initial Resistance (IWC)	[value]	[value]	[value]	[value]	[value]	

Specifically, Electronic Air Cleaners cannot be tested for MERV using ASHRAE 52.2 since there is carbon in the ASHRAE 52.2 test dust which can inhibit proper operation. Since the high quantity of carbon in the test dust is not a real world condition, Rating Method AHRI 680 was developed to solve this issue and uses a non-carbon test dust. Both EAC's and media testing are compatible with AHRI 680, but the AHRI 680 rating procedure does not include a MERV.

The requirement to use MERV in the Title 20 label creates a problem. Requiring this label will restrain free trade and put an expensive burden on both consumers and industry by removing commonly used high performance air cleaners from the California marketplace.

If a label is required, a solution is to remove MERV from the label since particulate efficiency will be published in the CEC directory using either ASHRAE 52.2 or AHRI 680. Alternately, creating an equivalent MERV based on AHRI 680 can be done, but unproductively this will create additional consumer confusion.

Additionally, we believe that any mandatory requirements to label air filters on a state by state basis will add expense to consumers and not offer any additional benefits. Instead of requiring a product label, a more efficient and less costly approach is to allow the manufacturer to disclose

the efficiency and pressure drop ratings on the manufacturer's website. This is consistent with Title 24 requirements.

It would also be more legible as compared to placing the same information in a smaller font on an air filter due to space limitations. The website approach would meet CEC's disclosure objectives without being unduly burdensome for manufacturers and misleading to consumers.

Another important subject is that the CEC Title 20 proposal lacks content about the importance of balancing energy savings with health concerns of occupants. The focus on energy is important, but the document should acknowledge that saving energy should not be at the expense of occupant health. There are a number of reports such as Logue J.M., et al. (2011) A Method to Estimate the Chronic Health Impact of Air Pollutants in U.S. Residences. LBNL-5267E that proves that good indoor air quality has a very significant impact on health. In fact, indoor particulate cleanliness is more significant than second hand smoke or ozone. The CEC approach should be balanced and not initiate another Sick Building Syndrome (SBS) scenario, similar to the previous SBS experience which was in part due to changes triggered by a singular focus on energy during the energy crisis in the 1970s.

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

Sincerely,

Eric Brodsky

Eric Brodsky P.E.
Director of Technology