

Energy - Docket Optical System

From: Roy, Aniruddh [Aniruddh.Roy@goodmanmfg.com]
Sent: Monday, November 24, 2014 2:31 PM
To: Energy - Docket Optical System; Alatorre, Mark@Energy
Cc: Clark, Gary; Tharp, Rusty
Subject: Additional Goodman Comments: 2016 Building Standards Update (Docket Number 14-BSTD-01)
Attachments: 10-31-2014 Goodman Comments.pdf

Hello,

Attached is a letter that was submitted by Goodman Global, Inc. ("Goodman") on October 31, 2014 with respect to the topics addressed at CEC's November 3, 2014 staff workshop on the draft language associated with residential and nonresidential building energy efficiency standards.

We have the following additional comments on the Title 24 standards since the pre-rulemaking comment period was extended to November 24, 2014:

1. Section 150.0(m)15 mandates a minimum of 350 CFM per ton of nominal cooling capacity for zonally controlled central forced air systems. However, many equipment manufacturers offer products that have AHRI rated performance with less than 350 CFM per ton airflow. It is important to note that airflow rates were not included within the AHRI Directory of Certified Product Performance when the final version 2013 edition of Title 24 was issued. Airflow rates for all models are now available on this online rating directory and we recommend that CEC update its standards to acknowledge the changes that have been made by the industry. CEC should allow the use of airflow values associated with AHRI's certified ratings, including values below 350 CFM per ton.
2. Proposed changes to section 150.1(c)9 – the additional requirements regarding ducts and air handlers located in conditioned spaces should specify a maximum external static pressure. Not specifying such a value will continue to ignore the potential issues that could arise due to poor ductwork practices.

Best Regards,
Aniruddh Roy
Engineering Manager, Regulatory Affairs
Goodman Manufacturing Company, L.P.
A member of **Daikin** group
10787 Clay Road
Houston, TX 77041
703-657-0398 office
540-818-3888 cell
Aniruddh.Roy@goodmanmfg.com