ARI AIR-CONDITIONING & REFRIGERATION INSTITUTE

Representing Manufacturers of Heating, Ventilating, Air-Conditioning and Refrigeration Products

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California Energy Commission
Docket No. 05-AAER-1
Docket Unit
1516 Ninth Street, Mail Station 4
Sacramento, CA 95814-5504

The Air-Conditioning and Refrigeration Institute (ARI) submits these written comments on the California Energy Resources Conservation and Development Commission (CEC) proposed amendments to the appliance efficiency regulations Title 20, Docket No. 05-AAER-1

ARI is a North American trade association representing the manufacturers of over 90% of U.S. produced air conditioning and commercial refrigeration equipment. ARI represents a domestic industry of approximately 200 air conditioning and refrigeration companies, employing approximately 150,000 men and women in the United States. The total value of member shipments by these companies is over $30 billion annually. We have reviewed the proposed amendments to the appliance efficiency regulations and would like to make the following comments:

Section 1606 (a) (4) A (iv) (VII) & (VIII)

The requirements of sections (iv) (VII) and (VIII) are misleading and could be misinterpreted by a code official enforcing the regulations as requiring that manufacturers test their products at both 230 and 208 volts. We believe that a correct interpretation would be that if a unit is tested at 230 volts and the results are applied to 208 volts in accordance with section (VII), then there is no need to test at 208 volts. In fact, this is the prevailing practice in the industry. Units are tested at 230 volts and the results are applied at 208 volts with no testing at 208 volts. However, section (VIII) also requires that units designed for use at 208 volts be tested at that voltage, which in fact could imply that units be tested at both 230 and 2008 volts. Consequently, we strongly recommend that section (VIII) be either deleted in its entirety or rewritten so that it is clear that testing at both voltages is not required.

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Section 1606 (a) (4) A (v) (I) & (II)

The requirements of sections (v) (I) and (II) regarding labeling with the applicable version of ASHRAE 90.1 is unreasonable. ASHRAE 90.1 is under continuous maintenance and is reissued every three years. However the minimum efficiency requirements listed in various tables of the standard are not subject to frequent changes. In fact, most of the minimum efficiency standards for HVAC equipment have not changed since 1999. Requiring that the specific year of the standard be permanently marked on a unit could be misleading as a product marked for example as complying with the 1999 version of the standard might appear to be noncompliant with the 2001 version of the standard while in fact its efficiency standard might meet or exceed the 2001 minimum requirements.

We believe that the unit performance is fully described by its model number and the associated product literature, directories, etc., and that conformity to specific editions of standards is not warranted. Full compliance with ASHRAE 90.1 could easily be verified by looking at the product manufacturer literature or trade association directories such as those developed by ARI. Consequently, we urge CEC to remove any specific reference to a particular edition of ASHRAE 90.1 from sections (v) (I) & (II).

We appreciate the opportunity to submit these comments. If you have any questions regarding this submission, please feel free to contact me.

Sincerely,

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