2111 Wilson Boulevard, Suite 500
Arlington, VA 22201, USA
www.ahrinet.org
PH 703.524.8800
FX 703.528.3816

Air-Conditioning, Heating, and Refrigeration Institute

DOCKET	
08-AAER-1B	
DATE:	10/17/08
REC'D:	10/17/08

October 17, 2008

California Energy Commission
Docket No. 08-AAER-1B
Docket Unit
1516 Ninth Street, Mail Station 4
Sacramento, CA 95814-5504
Via email: Docket@energy.state.ca.us

Re: Docket No. 08-AAER-1B; Comments of the Air-Conditioning, Heating and Refrigeration Institute

Dear Sir or Madam:

The Air-Conditioning, Heating and Refrigeration Institute (AHRI) is a U.S. based trade association whose 350 member companies account for more than 90 percent of the residential and commercial air-conditioning, space heating, water heating and commercial refrigeration equipment manufactured and sold in North America. We appreciate the opportunity to comment on the California Energy Commission's (CEC) proposed amendments to its Title 20 appliance efficiency regulations. Our comments concern proposed changes to the definitions set forth in Section 1602 (e) Gas and Oil Space Heaters and Electric Residential Boilers, of the Title 20 regulations.

The proposed definition of direct vent system, shown below, is incorrect and inconsistent with the industry's use of that term. This definition appears to include what is known in the industry to be an isolated combustion system installation. Also, we do not understand why the issue of draft relief and draft control devices has been added while at the same time the critical aspect that a direct vent system vents the products of combustion directly to the outdoors has been eliminated.

Direct vent system - a system supplied by a manufacturer which provides outdoor air or air from an unheated space (such as an attic or crawl space) directly to a furnace or vented heater for combustion and for draft relief if the unit is equipped with a draft control device.

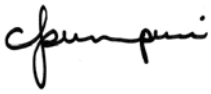
We recommend the adoption of the definition used in the nationally recognized American National Standards Institute (ANSI) Z21 and Z83 series of gas appliance safety standards, and which is used and accepted by the industry as a whole. That definition of a direct vent system is as follows:

A system supplied by the manufacturer and constructed so that all air for combustion is obtained from the outside atmosphere and all flue gases are discharged to the outside atmosphere.

It appears that the proposed definition is attempting to interject an interpretation that air obtained from an unheated attic or crawl space is "outdoor" air. If that is the case, we suggest that a revised or special definition of "outdoor air" be added rather than incorrectly amend a long standing industry definition. We believe the use of consistent terminology is important in reducing confusion in the marketplace.

Again, AHRI appreciates the opportunity to comment on the proposed amendments to the CEC's Title 20 definitions. We look forward to working with CEC staff as an effective way to facilitate compliance with the CEC's regulations.

Sincerely,



Gloria Pumpuni
Director, Regulatory Policy
AHRI-Air Conditioning, Heating and Refrigeration Institute
2111 Wilson Boulevard, Suite 500
Arlington, Virginia 22201