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### **Michael Ivanovich**

## Senior Director, Global Affairs AMCA International

- Joined AMCA in 2011
- Coordinates global AMCA advocacy
- Primary staff person for U.S. state and federal regulations
- Past chief editor of HPAC Engineering and Consulting-Specifying Engineer
- B.Sc. Computer Science & Mathematics
- M.Sc. Building Systems Engineering
- Contact: mivanovich@amca.org



#### **Ken Kuntz**

# Principal Engineer – Regulatory Compliance Greenheck

- Joined Greenheck in 2006
- Responsible for air movement product certifications and supporting standards, codes and regulatory activities
- Member ASHRAE TC 5.1 Fans, AMCARC, and Energy Efficiency sub-committee of AMCARC
- Mechanical Aerospace Engineering University of Missouri
- Contact: <u>kenneth.kuntz@greenheck.com</u>



### Rad Ganesh, PhD, PE

# Director, Product Applications Twin City Fan Companies (TCFC)

- 36+ years of experience in HVAC and Fan industries
- 23 years in TCFC, in Applications / Design Engineering, Regulations
- Technical leader for regulatory compliance for TCFC and AMCA.
- PhD in Mechanical Engineering, Missouri University of Science and Technology
- Contact: rganesh@tcf.com



#### **Christian Taber**

#### Principal Engineer – Codes and Standards Big Ass Fans

- Joined fan industry in 2008
- NA-AMCARC chair
- AMCA Board of Directors
- BSc Chemical Engineering, MSc Mechanical Engineering, MSc Biosystems Engineering
- Contact: ctaber@bigassfans.com



### **Mark Bublitz**

# **Executive VP – Industry Affairs The New York Blower Company**

- Chairman of the AMCA Board of Directors
- 35 years in the industry
- 20 years AMCA involvement
- Involved in the US regulation effort since 2013
- Chair of AMCARC Energy Efficiency Subcommittee
- B.S., M.S, Mechanical Engineering, MBA
- Contact: mbublitz@nyb.com





# Overview of Regulation and Schedule

### Outline

- DOE Draft Energy Standard: Status, Future Steps
- Fan Energy Index: Levels and Calculations
- Tolerances and Surveillance Testing
- Air Circulating Fans
- Summary & Call to Action
- Q&A
- Bonus Slides for Discretionary Review

### Status of Fan Regulations

- DOE Test Procedure
  - Published May 1, 2023
  - Corrected August 20, 2023
  - Took effect October 30, 2023
  - 34 manufacturers have extension to April 29, 2024
- California Title 20
  - Completed Nov. 22, 2022
  - Original effective date of Nov 22, 2023
  - Now updating language to adopt DOE test procedure
  - New effective date of April 29, 2024
  - Staff will communicate other changes when CEC finalizes language
  - Manufacturers can voluntarily file in compliance database; several already have
    - Bonus Slides has info on CEC Title 20 database

### Status of Fan Regulations

- DOE Energy Standard "Notice of Proposed Rule" (NOPR)
  - Pre-publication sent Dec. 30, 2023
  - Official Federal Register publication Jan. 19
  - Live/Remote hearing on Feb. 21
  - Deadline for comments on March 19
  - Expected to be completed in 2024
  - Expected to take effect in 2029
  - Covers General Fans and Blowers (commercial/industrial fans/blowers)
  - Covers Air Circulating Fans (that are not ceiling fans)

### Critical Links to DOE Websites

- DOE "Home Page" for Fan Regulation
  - http://tinyurl.com/yckavb97
  - Has links to everything, including dockets
- DOE test procedure:
  - General Fans and Blowers: <u>Appendix A to Subpart J of 10 CFR Part 431</u>
  - Circulating Fans: Appendix B to Subpart J of 10 CFR Part 431
- Draft Energy Standard (Notice of Proposed Rule NOPR)
  - Text (HTML) version
  - PDF Federal Register version (after clicking on link, do File Save As...)
  - Has instructions for attending Feb. 21 hearing live or online
  - Has instructions for submitting comments directly to DOE

### DOE Regulation: Two Parts

#### Test Procedure

- Definitions
- Scope
- Method of Test
- Sampling Plan
- Ratings Calculation
- Penalties for Noncompliance
- Deadline (90 days)
- Final Rule: May 2023
- Correction: August 2023
- Effective date; October 30, 2023

#### Energy Standard

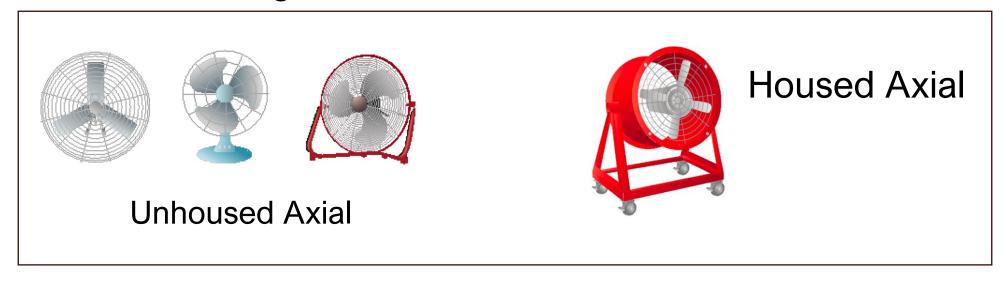
- Scope
- Minimum Performance Requirements
- Labeling (optional)
- Certification (optional)
- Surveillance
- Penalties for Noncompliance
- Deadline (5 years)
- Draft currently under public review
- Will complete in 2024
- Take effect in 2029

## Scope: Fan Sizes and Types

- General Fans and Blowers
  - Fan Size: 1 HP (motor) ≤ 150 HP (air power)
  - Regulatory Metric: Fan Energy Index (FEI)
  - Classes/Types
    - Radial housed fan
    - Centrifugal housed fan
    - Centrifugal inline fan
    - Centrifugal unhoused fan
    - Centrifugal power roof ventilator exhaust fan
    - Centrifugal power roof ventilator supply fan
    - Axial inline fan
    - Axial panel fan
    - Axial power roof ventilator fan

### Scope: Fan Sizes and Types

Air Circulating Fans



Covered if  $\geq$  125 W electrical input power at maximum speed

Housed centrifugal ACF are exempt from energy standard

Carpet drying fans, for example



### Scope Exclusions

- GFBs are not:
  - (i) A radial housed unshrouded fan with blade diameter at tip less than 30 inches or a blade width of less than 3 inches;
  - (ii) A safety fan;
  - (iii) An induced flow fan;
  - (iv) A jet fan;
  - (v) A cross-flow fan;
  - (vi) A fan manufactured exclusively to be powered by internal combustion engines;
  - (vii) A fan that create a vacuum of 30 inches water gauge or greater;
  - (viii) A fan that is designed and marketed to operate at or above 482 degrees Fahrenheit (250 degrees Celsius); or

See bonus slides for exclusions pertaining to fans embedded in equipment

### Scope Differences from California Title 20

- DOE includes Embedded Fans as GFB
  - See Bonus Slides for specific inclusions and exclusions

- DOE includes Air Circulating Fans (ACF)
  - Ceiling fans covered by separate rule
  - Electrical input power ≥ 125 W at maximum speed
- Scope differences will likely remain after CEC changes Title 20

### AMCA Response to NOPR

- Engaged committees:
  - N.A. Air Movement and Code Action Review Committee (AMCARC)
    - Energy Efficiency Subcommittee
  - Fan Engineering Committee
  - Marketing Committee

#### Consultants

- Tom Catania, Esq. regulatory affairs
- Nate Baker, Cadeo Project planning; Fan Shipment Database Analyses
- Tim Mathson, Retired Fan engineering and FEI nuances

## Tiered Advocacy Approach

Tier 2: Advocate Beyond Appliances Program

Tier 1: Normal Advocacy

Notice of Proposed Rule (NOPR)

Establish coalitions

Amass research

Develop review comments

Participate in public meeting

After NOPR Comments

Identify and message key issues, industry impacts, and alternative approaches

Homework for Tier 3/4

Tier 3: Congressional Advocacy Professional Lobbyists

Final Rule

Litigation

Tier 4:

NOPR Second Draft Or Final Rule

Note:

Developed this for DOE Test Procedure Never made it to Tier 2



70% Peak Efficiency

FEI ≥ 1.00

1200 RDM

### **FEI Levels and Calculations**

**Ken Kuntz** 

**Principal Engineer, Regulatory Compliance** 

Greenheck

600 RPM

400 RPM

## Discussion Objective

- Review Equipment Classes designated by DOE
- Review minimum required FEI levels for each equipment class
- Overview of FEI modification coefficients
  - Example calculation

# **Equipment Classes**

Table L.1 Proposed Energy Conservation Standards for CFRs

Axial Power Roof Ventilator Centrifugal Housed Centrifugal Unhoused Centrifugal Inline Radial Housed Centrifugal Power Roof Ventilator - Exhaust Centrifugal Power Roof Ventilator	Equipment Class
Centrifugal Housed Centrifugal Unhoused Centrifugal Inline Radial Housed Centrifugal Power Roof Ventilator - Exhaust Centrifugal Power Roof Ventilator	Axial Inline
Centrifugal Housed Centrifugal Unhoused Centrifugal Inline Radial Housed Centrifugal Power Roof Ventilator - Exhaust Centrifugal Power Roof Ventilator	Axial Panel
Centrifugal Unhoused Centrifugal Inline Radial Housed Centrifugal Power Roof Ventilator - Exhaust	Axial Power Roof Ventilator
Centrifugal Inline Radial Housed Centrifugal Power Roof Ventilator - Exhaust Centrifugal Power Roof Ventilator	
Radial Housed Centrifugal Power Roof Ventilator - Exhaust Centrifugal Power Roof Ventilator	
Centrifugal Power Roof Ventilator - Exhaust Centrifugal Power Roof Ventilator	
- Exhaust Centrifugal Power Roof Ventilator	

-9 basic equipment classes as defined in the test standard and follow AMCA 214 fan types

### **Equipment Classes**

Table I-1 Proposed Energy Conservation Standards for GFBs

Equipment Class	With or Without
	Motor Controller
Axial Inline	Without
Axial Panel	Without
Axial Power Roof Ventilator	Without
Centrifugal Housed	Without
Centrifugal Unhoused	Without
Centrifugal Inline	Without
Radial Housed	Without
Centrifugal Power Roof Ventilator	Without
- Exhaust	
Centrifugal Power Roof Ventilator	Without
- Supply	
Axial Inline	With
Axial Panel	With
Axial Power Roof Ventilator	With
Centrifugal Housed	With
Centrifugal Unhoused	With
Centrifugal Inline	With
Radial Housed	With
Centrifugal Power Roof Ventilator	With
- Exhaust	
Centrifugal Power Roof Ventilator	With
- Supply	

- -9 basic equipment classes as defined in the test standard
- -9 additional equipment classes for fans with motor controllers
- -Motor controller is any technology which allows motor speed control

### Minimum FEI Requirements

Table I-1 Proposed Energy Conservation Standards for GFBs

Equipment Class	With or Without	Fan Energy Index
	Motor Controller	(FEI)*
Axial Inline	Without	1.18
Axial Panel	Without	1.48
Axial Power Roof Ventilator	Without	0.85
Centrifugal Housed	Without	1.31
Centrifugal Unhoused	Without	1.35
Centrifugal Inline	Without	1.28
Radial Housed	Without	1.17
Centrifugal Power Roof Ventilator - Exhaust	Without	1.00
Centrifugal Power Roof Ventilator - Supply	Without	1.19
Axial Inline	With	1.18
Axial Panel	With	1.48
Axial Power Roof Ventilator	With	0.85
Centrifugal Housed	With	1.31
Centrifugal Unhoused	With	1.35
Centrifugal Inline	With	1.28
Radial Housed	With	1.17
Centrifugal Power Roof Ventilator - Exhaust	With	1.00
Centrifugal Power Roof Ventilator - Supply	With	1.19

- -Minimum FEI values vary between equipment classes
- -Range between 0.85 to 1.48

### Multiplier Coefficient "A"

Table I-1 Proposed Energy Conservation Standards for GFBs

Equipment Class	With or Without	Fan Energy Index		
	Motor Controller	(FEI)*		
Axial Inline	Without	1.18 * A		
Axial Panel	Without	1.48 * A		
Axial Power Roof Ventilator	Without	0.85 * A		
Centrifugal Housed	Without	1.31 * A		
Centrifugal Unhoused	Without	1.35 * A		
Centrifugal Inline	Without	1.28 * A		
Radial Housed	Without	1.17 * A		
Centrifugal Power Roof Ventilator - Exhaust	Without	1.00 * A		
Centrifugal Power Roof Ventilator - Supply	Without	1.19 * A		
Axial Inline	With	1.18 * A* B		
Axial Panel	With	1.48 * A* B		
Axial Power Roof Ventilator	With	0.85 * A* B		
Centrifugal Housed	With	1.31 * A* B		
Centrifugal Unhoused	With	1.35 * A* B		
Centrifugal Inline	With	1.28 * A* B		
Radial Housed	With	1.17 * A* B		
Centrifugal Power Roof Ventilator - Exhaust	With	1.00 * A* B		
Centrifugal Power Roof Ventilator - Supply	With	1.19 * A* B		

Table I-2 Constants for GFB Proposed Energy Conservation Standards

Constant	Condition	Value
A	Motor hp < 100 hp	A = 1.00
	Motor hp $\geq$ 100 hp and $\leq$ 250 hp	$A = \frac{\eta_{mtr,2023act}}{1}$
		$\eta_{mtr.2014ref}$
1		

<sup>\*</sup>A is a constant representing an adjustment in FEI for motor hp, which can be found in Table I-2. B is a constant representing an adjustment in FEI for motor controllers, which can be found in Table I-2

<sup>-</sup>Coefficient "A" is an adjustment based upon motor horsepower applied to all equipment classes

### Multiplier Coefficient "A"

Condition	Value
Motor hp < 100 hp	A = 1.00
Motor hp $\geq$ 100 hp and $\leq$ 250 hp	$A = \frac{\eta_{mtr,2023act}}{\eta_{mtr,2023act}}$
	$\eta_{mtr,2014ref}$

-Coefficient "A" Value =1.00 for motor hp < 100

-ls a ratio of motor efficiency values for hp > 100

-Range is ~1.0031 to 1.0095

	2	2	4	4	6	6	8	8
HP	Enclosed	Open	Enclosed	Open	Enclosed	Open	Enclosed	Open
100	1.009564	1.009615	1.008386	1.008386	1.008421	1.008421	1.009615	1.009564
125	1.004211	1.004251	1.008386	1.008386	1.008421	1.008421	1.009564	1.009564
150	1.004211	1.004251	1.004175	1.004175	1.008386	1.004193	1.009564	1.009564
200	1.004193	1.004211	1.003119	1.004175	1.008386	1.004193	1.009524	1.009564
250	1.004175	1.004211	1.003119	1.004175	1.004175	1.004175	1.004211	1.004211

## Multiplier Coefficient "B"

Table I-1 Proposed Energy Conservation Standards for GFBs

Equipment Class	With or Without	Fan Energy Index
	Motor Controller	(FEI)*
Axial Inline	Without	1.18 * A
Axial Panel	Without	1.48 * A
Axial Power Roof Ventilator	Without	0.85 * A
Centrifugal Housed	Without	1.31 * A
Centrifugal Unhoused	Without	1.35 * A
Centrifugal Inline	Without	1.28 * A
Radial Housed	Without	1.17 * A
Centrifugal Power Roof Ventilator - Exhaust	Without	1.00 * A
Centrifugal Power Roof Ventilator - Supply	Without	1.19 * A
Axial Inline	With	1.18 * A* B
Axial Panel	With	1.48 * A* B
Axial Power Roof Ventilator	With	0.85 * A* B
Centrifugal Housed	With	1.31 * A* B
Centrifugal Unhoused	With	1.35 * A* B
Centrifugal Inline	With	1.28 * A* B
Radial Housed	With	1.17 * A* B
Centrifugal Power Roof Ventilator - Exhaust	With	1.00 * A* B
Centrifugal Power Roof Ventilator - Supply	With	1.19 * A* B

<sup>\*</sup>A is a constant representing an adjustment in FEI for motor hp, which can be found in Table I-2. B is a constant representing an adjustment in FEI for motor controllers, which can be found in Table I-2

- Coefficient "B" is an adjustment for fans with Motor Controllers
- Based upon FEPact

Table I-2 Constants for GFB Proposed Energy Conservation Standards

Constant	Condition		Value
В	With Motor Controller	FEPact of < 20 kW (26.8 hp)	$B = \frac{FEP_{act}-Credit}{FEP_{act}}$ ; where: $Credit = 0.03 \times FEP_{act} + 0.08$ [SI] $Credit = 0.03 \times FEP_{act} + 0.08 \times 1.341$ [IP]
		FEPact of ≥ 20 kW (26.8 hp)	B = 0.966

## Multiplier Coefficient "B"

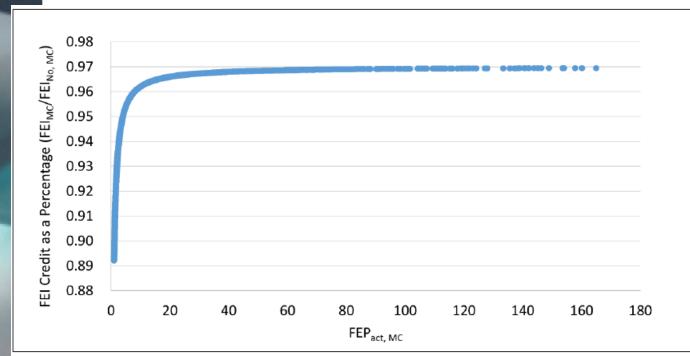


Figure 5.5.8 FEI Credit as a Percentage versus FEP<sub>act</sub> for Fans Sold with a Motor Controller

- -Adjustments range from ~0.88 to 0.966
- Constant 0.966 after 20kW or 26.8 hp

FEPact of < 20 kW (26.8	$B = \frac{FEP_{act} - Credit}{FEP_{act}}$ ; where:
hp)	$Credit = 0.03 \times FEP_{act} + 0.08$ [SI]
	$Credit = 0.03 \times FEP_{act} + 0.08 \times 1.341$ [IP]
FEPact of ≥	B = 0.966
20 kW (26.8	
hp)	

### Example

Purchaser wants an axial panel fan at 6,000 cfm and 0.5" w.g.

- Software selection program returns a fan with
  - 2 hp motor
  - Non-synchronous speed (has speed control)
  - FEI = 1.35
  - FEPact = 1.02

Is this fan compliant?



## Example – Determine "A" Coefficient

Customer wants a panel fan at 6,000 cfm and 0.5" w.g.

- Software selection program returns a fan with
  - 2 hp motor
  - Non-synchronous speed
  - FEI = 1.35
  - FEPact = 1.02

Use Requirements for fan with motor controller Minimum Compliant FEI for an axial panel fan = 1.48 \* A \* B

Condition	Value
Motor hp < 100 hp	A = 1.00
Motor hp $\geq$ 100 hp and $\leq$ 250 hp	$A = \frac{\eta_{mtr,2023act}}{\eta_{mtr,2014ref}}$

## Example – Determine "B" Coefficient

Customer wants a panel fan at 6,000 cfm and 0.5" w.g.

- Software selection program returns a fan with
  - 2 hp motor
  - Non-synchronous speed
  - FEI = 1.35
  - FEPact = 1.02 kW

#### Minimum Compliant FEI for axial panel fan = 1.48 \* A \* B

A=1.00

FEPact of < 20 kW (26.8	$B = \frac{FEP_{act} - Credit}{FEP_{act}}$ ; where:	
hp)		$Credit = 0.03 \times FEP_{act} + 0.08$ [SI]
		$Credit = 0.03 \times FEP_{act} + 0.08 \times 1.341$ [IP]
FEP	act of≥	B = 0.966
20 k	W (26.8	
hp)		

Credit = 
$$0.03 \times 1.02 + 0.08$$
  
=  $0.1106$ 

$$B = (1.02 - 0.1106) / 1.02$$
  
= 0.891

### Example

Customer wants a panel fan at 6,000 cfm and 0.5" w.g.

- Software selection program returns a fan with
  - 2 hp motor
  - Non-synchronous speed (speed control)
  - FEI = 1.35
  - FEPact = 1.02 kW

Minimum Compliant FEI for axial panel fan = 1.48 \* A \* B

A = 1.00

B = 0.891

= 1.48 \* 1.00 \* 0.891 = 1.318 required minimum FEI

1.35 > 1.318

## Issue: DOE Proposed FEI Levels are High

Equipment Class	Fan Energy Index (FEI)	
Axial Inline	1.18	
Axial Panel	1.48	ΨΛ 'ff = -1 -1 '414 -
Axial Power Roof Ventilator	0.85	*A if sold without a drive
Centrifugal Housed	1.31	divo
Centrifugal Unhoused	1.35	*A*B if sold with a drive
Centrifugal Inline	1.28	A O D
Radial Housed	1.17	A & B are adjustment parameters
Centrifugal Power Roof Ventilator - Exhaust	1.00	parameters
Centrifugal Power Roof Ventilator - Supply	1.19	



# Compliance per the DOE Test Procedure (TP) 10 CFR Parts 429, 430, 431, pages 27387 - 27394

- § 429.69 Fans and blowers.
- (a) Determination of represented values of fans and blowers other than air circulating fans. A manufacturer must determine the represented values for each basic model, either by testing in conjunction with the applicable sampling provisions or by applying an AEDM as set forth in this section and in § 429.70(n). Manufacturers must update represented values to account for any change in the applicable motor standards in Table 5 of § 431.25.
- (iii) If only one unit is tested, at each duty point characterized by a flow and speed value, any represented value of fan energy index ("FEI"), or other measure of energy consumption of a basic model for which consumers would favor higher values shall be less than or equal to the tested value. Represented values must be rounded to the nearest hundredth.

**27312 Federal Register** / Vol. 88, No. 83 / Monday, May 1, 2023 / Rules and Regulations

DEPARTMENT OF ENERGY 10 CFR Parts 429 and 430

[EERE-2021-BT-TP-0021]

RIN 1904-AF17

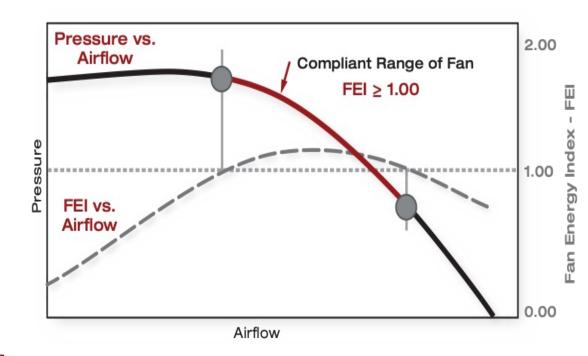
**Energy Conservation Program: Test Procedure for Fans and Blowers** 

**AGENCY:** Office of Energy Efficiency and

Renewable Energy, Department of

Energy.

**ACTION:** Final rule.



# DOE TP: Departure from AMCA 214 FEI calculation for Motors + Controllers - page 27348

- Therefore, DOE is not allowing the use of section 6.4.2.4 of AMCA 214–21. Instead, DOE requires that fans with motor and controller be tested in accordance with section 6.1 of AMCA 214–21. (Wire to Air Testing). DOE notes that manufacturers would still be able to rely on a mathematical model (including the same mathematical model as described in section 6.4.2.4 of AMCA 214-21, (Combined motor-VFD efficiency ) as long as the mathematical model meets the AEDM requirements discussed in Section III.I of this document) in lieu of testing to determine the FEI of a fan with a motor and controller.
- Hence AEDM project is proceeding at AMCA...

# **DOE NOPR:** Introduced a baseline calculation for Motor + Controller (Baseline FEI Calcs) – pages 3874-3875

Federal Register / Vol. 89, No. 13 / Friday,
January 19, 2024 / Proposed Rules
DEPARTMENT OF ENERGY
10 CFR Parts 429 and 431
[EERE-2022-BT-STD-0002]
RIN 1904-AF40
Energy Conservation Program: Energy
Conservation Standards for Fans and
Blowers

**AGENCY:** Office of Energy Efficiency and Renewable Energy, Department of Energy.

**ACTION:** Notice of proposed rulemaking and announcement of public meeting.

- 2.6. Calculation based on Shaft-to-air testing for Fans with Motors and Motor Controllers. The provisions of section 6.4 of AMCA 214–21 apply except that the instructions in section 6.4.2.4.1 of AMCA 214–21 are replaced by section 2.6.1 of this appendix, and the instructions in section6.4.2.4.2. of AMCA 214–21 are replaced by section 2.6.2 of this appendix.
- 2.6.1 Motor efficiency if used in combination with a VFD. This section replaces section 6.4.2.4.1 of AMCA 214–21 and provides methods to calculate the efficiency of the motor if it is combined with a VFD.

#### DOE NOPR, page 3771: Soliciting input on 211-22 Tolerances

- DOE requests comments on whether it should apply a correction factor to the analyzed efficiency levels to account for the tolerance allowed in AMCA 211–22 and if so, DOE requests comment on the appropriate correction factor. DOE requests comment on the potential revised levels as presented in Table IV– 12 for a 5% Tolerance.
- Additionally, DOE requests comments on whether it should continue to evaluate an FEI of 1.00 for all fan classes if it updates the databases used in its analysis to consider the tolerance allowed in AMCA 211–22.

Table IV-12 Summary of Efficiency Levels for All GFB Equipment Classes
Considering a 5-percent AMCA 211-22 Tolerance Allowance

_	onsidering a 5-percent Africa 211-22 Tolerance Anowance							
	EL0	EL1	EL2	EL3	EL4	EL5	EL6	EL7
Axial Inline	0.80	0.83	0.96	1.12	1.30	1.48	-	
Panel	0.76	0.82	0.95	1.18	1.41	1.65	-	1
Axial PRV	0.63	0.67	0.69	0.72	0.82	0.95	1.19	1.42
Centrifugal PRV Exhaust	0.64	0.67	0.68	0.82	0.95	1.14	1.33	-
Centrifugal PRV Supply	0,65	0.68	0.72	0.83	0.95	1.13	1.29	-
Centrifugal Housed Main Path	0.60	0.90	0.96	1.09	1.24	1.39	-	-
Centrifugal Housed FC Path*	0.60	0.90	0.96	1.09	1.24	1.39	-	-
Centrifugal Unhoused	0.89	0.94	1.04	1.17	1.28	1.42	-	-
Centrifugal Inline	0.62	0.66	0.73	0.95	1.02	1.22	1.39	-
Radial	0.78	0.83	0.89	0.95	1.11	1.27	-	-

<sup>\*</sup>Design option applied relative to baseline fan instead of previous EL.

## § 429.134 Product-specific enforcement provisions. Page 3871

- When conducting enforcement testing, DOE proposes that it may choose to test either one fan at multiple duty points or multiple fans at one or more duty points to evaluate compliance of a certified basic model at each certified duty point.
- 2. Verification of duty points: At a given speed, the certified duty point will be considered valid only if the measured airflow is within five percent of the certified airflow and the measured static or total pressure is between  $P * (1-0.05)^2$  and  $P * (1+0.05)^2$  where P is the certified static or total pressure.
- (i)(A) If the certified duty point is found to be valid, the certified duty point will be used as the basis for determining compliance. DOE will convert the measured fan shaft power or FEP at the measured airflow to the certified airflow using the following equations:
- Fan shaft power: Converted fan shaft power

= Measured fan shaft power 
$$\left(\frac{certified \ airflow}{Measured \ airflow}\right)^3$$

• Fan electrical power.

Converted FEP = Measured FEP 
$$\times \left(\frac{certified\ airflow}{Measured\ airflow}\right)^3$$

#### PART 429—CERTIFICATION, COMPLIANCE, AND ENFORCEMENT—page 3870

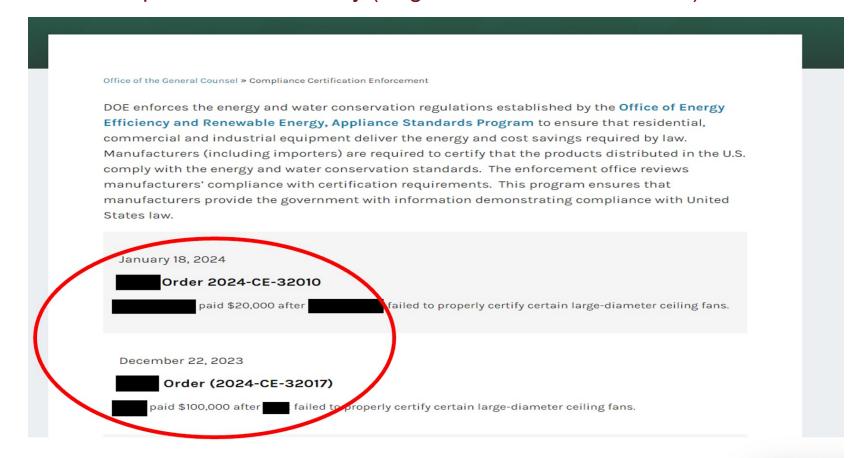
- § 429.110 Enforcement testing.
- When testing a single unit, DOE will first determine either fan shaft input power or FEP, dependent on the test method specified by the manufacturer, for the range of certified duty points according to appendix A to subpart J of part 431 of this chapter. For each point in the certified operating range (*i.e.*, each certified duty point), DOE will conduct a verification of the duty points as described in § 429.134(bb)(2) and determine the FEI at the certified duty point or at the measured duty point. If the FEI calculated at the certified or measured duty point is greater than or equal to the minimum required FEI, then testing is complete and the certified or measured duty point is compliant. If the FEI calculated at a certified or measured duty point is less than the minimum required FEI, DOE may select additional units to test in accordance with this paragraph (e)(7)(ii) of this section.
- (ii) When testing more than one unit, DOE will select no more than three additional units of a certified basic model for testing and test each one at one or several duty points within the range of certified duty points. For each unit and at each certified duty point, DOE will conduct a verification of the duty points as described in § 429.134(bb)(2) and determine the FEI at the certified duty point or at the measured duty point. In the case where the certified duty point can be verified, DOE will calculate the average FEI of all units tested for each certified duty point. If the duty point cannot be verified, DOE will follow the sampling procedures at § 429.69 to determine the average FEI of all units tested at the measured duty point. If the average FEI calculated at the certified or measured duty point is greater than or equal to the minimum required FEI, then testing is complete and the certified or measured duty point is less than the minimum required FEI, then testing is complete and the certified or measured duty point is not compliant.

  Www.amca.org

## Maximum Civil Penalty for Non-Compliance

- § 429.120 Maximum civil penalty.
- Any person who knowingly violates any provision of § 429.102(a) may be subject to assessment of a civil penalty of no more than \$560 for each violation. As to § 429.102(a)(1) with respect to failure to certify, and as to § 429.102(a)(2), (5) through (9), each unit of a covered product or covered equipment distributed in violation of such paragraph shall constitute a separate violation. For violations of § 429.102(a)(1), (3), and (4), each day of noncompliance shall constitute a separate violation for each basic model at issue.

#### Example: Failure to Certify (Register Product in Database)





# **Air Circulating Fans**

Christian Taber
Principal Engineer – Codes and Standards
Big Ass Fans

## Circulating Fans – Test Procedure Review

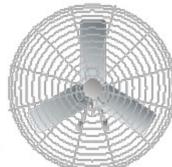
- DOE Test Procedure Appendix B to Subpart J of Part 431
- References ANSI/AMCA 230-23 as basis
- 125W or greater input power
- Air Circulating Fan Product Classes (Appendix B of AMCA 230)
  - Air circulating axial panel fan
  - Housed air circulating fan head
    - Box Fan
    - Cylindrical air circulating fan
    - Housed centrifugal air circulating fan
  - Unhoused air circulating fan head
- Efficiency metric is air circulating fan efficacy ( $\mathsf{E} f f_{\mathsf{circ}}$ )
  - CFM/W at maximum speed mandatory
  - Other speeds optional ( $Eff_{circ,XX}$ )
- Appurtenances mandatory
- Effective date October 30, 2023







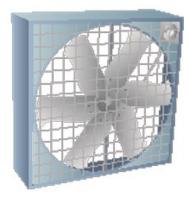




## Circulating Fans – Test Procedure Divergence

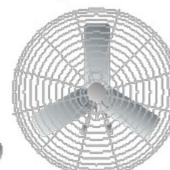
- Test voltage, phase, frequency specified
- Stability requirements (120s intervals, 3x)
  - Fan speed 1% or 1 rpm
  - Input power 1% or 1 W
  - Load differential 1%
  - Slopes of trends for each (no three the same direction)
- Minimum of two samples § 429.11
- Represented values determined statistically § 429.69
- Effective date October 30, 2023











## Inputs into DOE Energy Standard Analysis

- Fan performance data ("combined database")
  - BESS Lab performance database
  - Manufacturer catalogs
- Agricultural fan efficiency incentives (utility rebates)
- Product teardowns
  - Technologies
  - Construction
  - Cost data
- Markups
- Annual operating hours

## ACF – Fan Models Analyzed by DOE

Equipment Class	Diameter (in)	EL	Airflow (cfm)	Power (w)			
12" to 36" axial ACF	24	ELO	3,436	1,155			
	24	EL1	3,436	1,155			
	24	EL2	3,451	1,087			
	24	EL3	3,614	589			
	24	EL4	3,792	312			
	24	EL5	3,926	196			
	24	EL6	3,980	164			
36" to 48" axial ACF	36	ELO	8,339	1,601			
	36	EL1	8,347	1,412			
	36	EL2	8,357	1,289			
	36	EL3	8,385	834			
	36	EL4	8,421	487			
	36	EL5	8,447	336			
	36	EL6	8,458	284			
>48" axial ACF	52	ELO	20,487	2,442			
	52	EL1	20,513	2,215			
	52	EL2	20,541	1,931			
	52	EL3	20,600	1,448			
	52	EL4	20,684	962			
	52	EL5	20,733	762			
	52	EL6	20,757	674			
Housed Cent ACF	11	ELO	953	717			
	11	EL1	953	717			
	11	EL2	958	666			
	11	EL3	986	455			
	11	EL4	1,023	280			
	11	EL5	1,058	180			
	11	EL6	1,072	153			
Source		DOE NOPR ACF LCC (Equip Price					

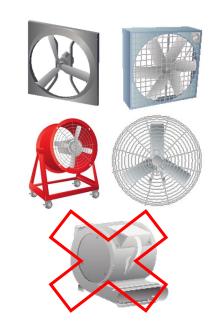
Baseline - Low Efficiency PSC motor + Belt Drive
Direct Drive
High Efficiency PSC motor
Aero Redesign 1 - EL2+(EL4-EL2)*0.33
Aero Redesign 2 - Ag Rebate Efficiency Levels
Aero Redesign 3 - Max efficiency in ACF database
EC Motor (20% better than IE4)

## ACF – Summary of DOE Analysis

Equipment Class	Diameter (in)	EL	Airflow (cfm)	Power (w)	Thrust (lbf)	Efficiency (cfm/W)	Thrust Eff (lbf/kW)	Drive	Motor	Bare Shaft	Motor	Belt Drive	MPC	Annual kWh	Air Power (W)	W-T-A Efficiency
12" to 36" axial ACF	24	ELO	3,436	1,155	2.43	2.98	2.1	Direct	PSC (61.6%)	\$73.70	\$37.41	-	\$111.11	1,284	30.1	2.6%
	24	EL1	3,436	1,155	2.43	2.98	2.1	Direct	PSC (61.6%)	\$73.70	\$37.41	-	\$111.11	1,284	30.1	2.6%
	24	EL2	3,451	1,087	2.46	3.18	2.3	Direct	PSC (65.7%)	\$73.70	\$54.50	-	\$129.29	1,283	30.5	2.8%
	24	EL3	3,614	589	2.69	6.14	4.6	Direct	PSC (65.7%)	\$73.70	\$54.50	-	\$129.29	1,186	35.0	5.9%
	24	EL4	3,792	312	2.96	12.20	9.5	Direct	PSC (65.7%)	\$73.70	\$54.50	-	\$129.29	827	40.4	13.0%
	24	EL5	3,926	196	3.18	20.00	16.2	Direct	PSC (65.7%)	\$73.70	\$54.50	-	\$129.29	535	44.9	22.9%
	24	EL6	3,980	164	3.27	24.30	19.9	Direct	ECM (79.8%)	\$73.70	\$83.92	-	\$159.99	449	46.7	28.5%
36" to 48" axial ACF	36	ELO	8,339	1,601	6.37	5.21	4.0	Belt (88.1%)	PSC (63.1%)	\$164.60	\$47.84	\$62.50	\$274.95	2,244	84.9	5.3%
	36	EL1	8,347	1,412	6.38	5.91	4.5	Direct	PSC (63.1%)	\$164.60	\$47.84	-	\$212.86	2,217	85.2	6.0%
	36	EL2	8,357	1,289	6.40	6.48	5.0	Direct	PSC (69.2%)	\$164.60	\$65.00	-	\$231.12	2,189	85.5	6.6%
	36	EL3	8,385	834	6.44	10.1	7.7	Direct	PSC (69.2%)	\$164.60	\$65.00	-	\$231.12	1,977	86.3	10.4%
	36	EL4	8,421	487	6.50	17.3	13.3	Direct	PSC (69.2%)	\$164.60	\$65.00	-	\$231.12	1,326	87.5	18.0%
	36	EL5	8,447	336	6.54	25.2	19.5	Direct	PSC (69.2%)	\$164.60	\$65.00	-	\$231.12	915	88.3	26.3%
	36	EL6	8,458	284	6.55	29.8	23.1	Direct	ECM (81.8%)	\$164.60	\$97.17	-	\$264.57	775	88.6	31.2%
>48" axial ACF	52	ELO	20,487	2,442	18.43	8.39	7.5	Belt (90.6%)	PSC (66.0%)	\$266.58	\$99.32	\$63.73	\$429.63	4,131	289.3	11.8%
	52	EL1	20,513	2,215	18.48	9.26	8.3	Direct	PSC (66.0%)	\$266.58	\$99.32	-	\$366.35	4,091	290.4	13.1%
	52	EL2	20,541	1,931	18.53	10.6	9.6	Direct	PSC (75.8%)	\$266.58	\$126.60	-	\$393.16	4,041	291.6	15.1%
	52	EL3	20,600	1,448	18.64	14.2	12.9	Direct	PSC (75.8%)	\$266.58	\$126.60	-	\$393.16	3,696	294.1	20.3%
	52	EL4	20,684	962	18.79	21.5	19.5	Direct	PSC (75.8%)	\$266.58	\$126.60	-	\$393.16	2,611	297.7	31.0%
	52	EL5	20,733	762	18.88	27.2	24.8	Direct	PSC (75.8%)	\$266.58	\$126.60	-	\$393.16	2,072	299.8	39.3%
	52	EL6	20,757	674	18.92	30.8	28.1	Direct	ECM (85.8%)	\$266.58	\$164.95	-	\$433.88	1,833	300.9	44.6%
Housed Cent ACF	11	ELO	953	717	0.89	1.33	1.2	Direct	PSC (62.4%)	\$31.05	\$31.63	-	\$62.88	1,034	14.5	2.0%
	11	EL1	953	717	0.89	1.33	1.2	Direct	PSC (62.4%)	\$31.05	\$31.63	-	\$62.88	1,034	14.5	2.0%
	11	EL2	958	666	0.90	1.44	1.4	Direct	PSC (67.6%)	\$31.05	\$59.39	-	\$90.44	1,029	14.8	2.2%
	11	EL3	986	455	0.95	2.17	2.1	Direct	PSC (67.6%)	\$31.05	\$59.39	-	\$90.44	899	16.1	3.5%
	11	EL4	1,023	280	1.03	3.65	3.7	Direct	PSC (67.6%)	\$31.05	\$59.39	-	\$90.44	607	18.0	6.4%
	11	EL5	1,058	180	1.10	5.87	6.1	Direct	PSC (67.6%)	\$31.05	\$59.39	-	\$90.44	395	19.9	11.0%
	11	EL6	1,072	153	1.13	7.02	7.4	Direct	ECM (80.8%)	\$31.05	\$85.06	-	\$116.11	334	20.7	13.6%
Source		DOE	NOPR ACF LCC (Ed	quip Price)	AMCA 230-23 Eq 8.10	TSD Table 5.6.10	AMCA 230-23 Eq 8.17	TSD Table 5.6.4	TSD Table 5.6.7	TSD Table 5.7.4	TSD Table 5.7.6	TSD Table 5.7.5	TSD Table 5.7.7	TSD Table 7.2.12	AMCA 230	-23 Eq 8.15

## Circulating Fans – EC NOPR

- Performance data per DOE test procedure
- Two Equipment Classes
  - Axial ACF (3 bins)
  - Housed Centrifugal ACF (No min)
- TSL 4 Selected (EL 4)



#### **Table I-3 Proposed Energy Conservation Standards for ACFs**

Equipment Class*	Efficacy at Maximum Speed (CFM/W)					
Axial ACFs; 12 inches $\leq$ D $\leq$ 36 inches	12.2					
Axial ACFs; 36 inches ≤ D < 48 inches	17.3					
Axial ACFs; 48 inches ≤ D	21.5					
Housed Centrifugal ACFs	N/A					

\*D: Diameter in inches

N/A: Not applicable; DOE is not proposing to set a standard for this equipment class.

## ACF Major Concerns - Part 1

- Is the combined database representative of the current market?
  - BESS Lab data?
  - Manufacturer catalog data?
  - Modification of published data to AMCA 230-23 data?
- Conversion of utility rebate lbf/W to cfm/W reasonable?
- Efficiency Levels (EL) reasonable?
  - Airflow, Power, Efficiency reasonable/representative of the market for each baseline fan (EL0)?
  - Does the selected technology achieve the increased efficiency (EL1-EL6)?
  - Manufacturer's cost data reasonable (EL0-EL6)?

## ACF Major Concerns - Part 2

- Markups reasonable?
- Annual operating hours reasonable?
- Equipment Class bins & associated cfm/W levels reasonable and equitable for all ACF classes? Can they be gamed?
  - Linear vs bins?
  - Too high or too low?
  - Separate efficacies by product class?



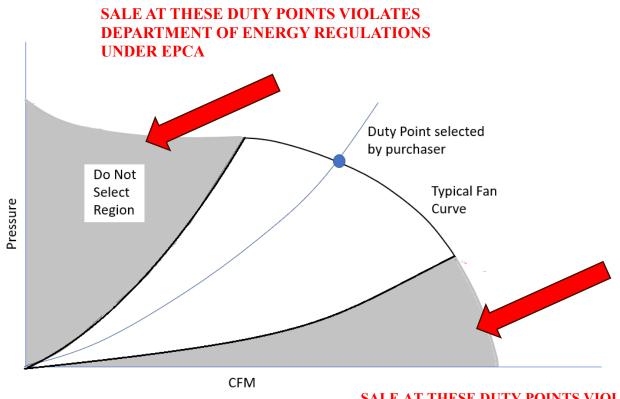
## Review/Summary: Major Issues

- Air Circulating Fans (ACFs)
  - Market samples > Max Tech Analysis > Levels
- General Fans and Blowers (GFBs)
- Levels (levels, levels!!!)
  - Market samples > Max Tech Analysis > Levels
- Credit for adjustable speed drives
  - Table I-2
- Complexity of the FEI calculation
- 211 Tolerances
- Representations

## Representations

GFB Representations including compliant and non-compliant points

- (1) identified by the following disclaimer: "Sale at these duty points violates Department of Energy Regulations under EPCA" in all capital letters, red, and bold font; and
- (2) grayed out in any graphs or tables in which they are included."



SALE AT THESE DUTY POINTS VIOLATES DEPARTMENT OF ENERGY REGULATIONS UNDER EPCA

### Call to Action

- Take the regulations seriously: DOE fines can be ruinous
- Review NOPR and provide comments to DOE
- Engage customers to review and comment as well provide Owner perspective
  - Industrial
  - Pharmaceutical
  - Severe, Risky, Mission-Critical Applications
    - Defense
    - Life-Safety
    - Nuclear
    - Heavy Industry
    - etc.

### Call to Action

# KEY RESOURCE: DOE Fans and Blowers Rulemaking "Home Page" <a href="http://tinyurl.com/yckavb97">http://tinyurl.com/yckavb97</a>

- Current announcements and hyperlinks to rulemakings and dockets
- Sign up for email alerts for updates
- Obtain copies of the NOPR
- · Has links to dockets for energy standard and test procedure
- Register for Feb. 21 hearing, in person or remote
- Instructions for filing comments to DOE by March 19, 2024



# Questions and Answers

Contact: Michael Ivanovich, mivanovich@amca.org



### **BONUS SLIDES**



# Resources for Today's Presentation

## How to Get Certified FEI Ratings for Fans

- Because of these complexities, AMCA recommends specifying AMCA-certified fans
  - www.amca.org/Find-FEI
  - 600+ fan models are certified
  - Get a hyperlinked list of manufacturers with certified software having FEI ratings
  - Download manufacturer software



### **AMCA** Resources

- AMCA International: <u>www.amca.org</u>
- AMCA Certified FEI ratings: <u>www.amca.org/find-FEI</u>
- AMCA Standards 214, 230: <u>www.amca.org/store</u> (Available for purchase)
- AMCA microsite for FEI training, technical papers, PowerPoints, and regulatory status: <u>www.amca.org/fei</u>
- Other AMCA Web pages for webinars, papers, etc. on many other topics: <u>www.amca.org/educate</u>

### Other Resources

#### CEC Title 20 Energy Code Ace

- www.energycodeace.com
- Education, compliance, Q&A, regulatory language



#### DOE Fans and Blowers Rulemaking "Home Page"

- http://tinyurl.com/yckavb97
- Current announcements and hyperlinks to rulemakings and dockets
- Sign up for email alerts to changes
- Obtain copies of the NOPR and supporting documents
- Register for Feb. 21 hearing, in person or remote
- See instructions for filing comments to DOE by March 19, 2024



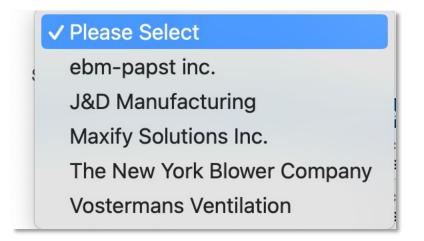
# COMPLIANCE WITH CALIFORNIA TITLE 20

### California Compliance Check: How to Find Fans

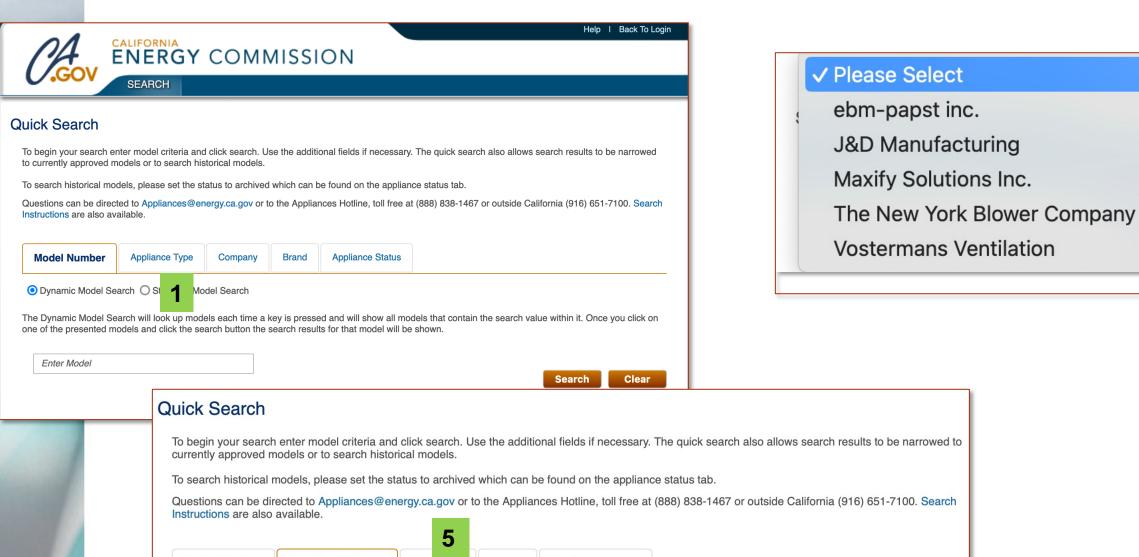
https://cacertappliances.energy.ca.gov/Pages/ApplianceSearch.aspx

#### MAEDbS Quick Search for Manufacturers:

- 1. Click on Appliance Type
- 2. Category Select: Fans and Humidifiers
- 3. Appliance Type Select: Commercial and Industrial Fans and Blowers
- 4. Click Search
- **5. Click Company** for list of companies that have provided data



Can also search by Model Number!



Company

Select Appliance Type

Commercial & Industria \$

**Brand** 

Appliance Status

Clear

Search

Appliance Type

Model Number

Select Category

Fans and Dehumidifiers \$

### California Title 20 Permanent Label

- Part 1: Manufacturer, model, and date of manufacture
- Part 2: <u>Fan Energy Index ≥ 1.00 Efficiency boundaries</u>
  - a. maximum air flow (SCFM);
  - b. maximum fan speed (RPM);
  - c. maximum pressure (inches water gauge).

NOTE: Operation outside of these boundaries will result in an energy inefficient operation.

- Parts 1 and 2 do not have to be on the same label
- New: Labels must be "permanent" and legible: readable without removing parts and using visual aids

### California Title 20 Resources

- Energy Code Ace <u>www.energycodeace.com</u>
  - Education, compliance, Q&A, regulatory language
  - Modules and fact sheets for manufacturers, designers
  - MAEDbS training
  - Recently updated training modules
  - Has resources for Title 24 energy code as well





## Glossary of Acronyms and Abbreviations

• ASHRAE 90.1 ANSI/ASHRAE/IEC Standard 90.1, Energy Standard for Buildings

Except Low-Rise Residential Buildings

• ASHRAE 189.1 ANSI/ASHRAE/IEC/USGBC Standard 189.1, Standard for the Design

of High-Performance Green Buildings

• IECC International Energy Conservation Code

• IGCC International Green Construction Code

IAPMO International Association of Plumbing and Mechanical Officials

• UMC Uniform Mechanical Code

• Title 20 California Title 20 Appliance Efficiency Regulations

• Title 24 California Energy Code for Residential and Commercial Buildings

• DOE U.S. Department of Energy

(Appliances and Equipment Standards Program)

• CFR Code of Federal Regulations

• FEI Fan Energy Index

### Referenced AMCA Standards in Codes & Regulations

- Codes and Regulations typically reference standards for testing and/or rating calculations
- ANSI/AMCA Standard 210, Test standard for centrifugal, axial fans
  - DOE regulation for general fans and blowers
- ANSI/AMCA Standard 214, Test standard and ratings calculation for Fan Energy Index
  - DOE regulation for general fans and blowers
- ANSI/AMCA Standard 230, Test standard and ratings calculation for circulating fans, including ceiling fans
  - DOE regulations for large-diameter ceiling fans and air circulating fans
- ANSI/AMCA Standard 208, Rating calculation standard for FEI
  - Model and state energy codes

## DOE Scope: Centrifugal Fan Types

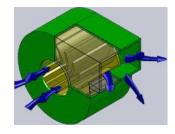
Radial housed fan



Centrifugal unhoused fan



Centrifugal housed fan



Centrifugal power roof ventilator exhaust fan



Centrifugal inline fan



Centrifugal power roof ventilator supply fan



### DOE Scope: Axial Fan Types

Axial inline fan



Axial panel fan



Axial power roof ventilator fan



## Scope Exclusions

- GFBs are not:
  - (i) A radial housed unshrouded fan with blade diameter at tip less than 30 inches or a blade width of less than 3 inches;
  - (ii) A safety fan;
  - (iii) An induced flow fan;
  - (iv) A jet fan;
  - (v) A cross-flow fan;
  - (vi) A fan manufactured exclusively to be powered by internal combustion engines;
  - (vii) A fan that create a vacuum of 30 inches water gauge or greater;
  - (viii) A fan that is designed and marketed to operate at or above 482 degrees Fahrenheit (250 degrees Celsius); or

## Scope Exclusions - continued

- GFBs are not:
  - (ix) A fan and blower embedded in the equipment listed below;
    - GFBs are not an embedded fan subject to the following exclusions:
      - (i) The federal test procedure does not apply to fans embedded in:
      - (A) Single phase central air conditioners and heat pumps rated with a certified cooling capacity less than 65,000 Btu/h
      - (B) Three phase, air-cooled, small commercial packaged air-conditioning and heating equipment rated with a certified cooling capacity less than 65,000 Btu/h
      - (C) Transport refrigeration (i.e., Trailer refrigeration, Self-powered truck refrigeration, Vehicle-powered truck refrigeration, Marine/Rail container refrigerant);
      - (D) Vacuum cleaners;
      - (E) Heat Rejection Equipment: Packaged evaporative open-circuit cooling towers; Evaporative field-erected open-circuit cooling towers; Packaged evaporative closed-circuit cooling towers; Evaporative field-erected closed-circuit cooling towers; Packaged evaporative condensers; Field-erected evaporative condensers; Packaged air-cooled (dry) coolers; Field-erected air-cooled (dry) cooler; Air-cooled steam condensers: Hybrid (water saving) versions of all of the previously listed equipment that contain both evaporative and air-cooled heat exchange sections;
      - (F) Air curtains; and
      - (G) Direct expansion-dedicated outdoor air system that are subject to any of DOE's test procedures

## Scope Exclusions - continued

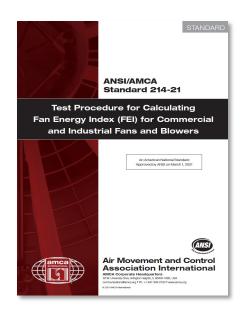
- (ii) The federal test procedure does not apply to supply or condenser fans embedded in:
- (A) Air-cooled commercial package air conditioners and heat pumps (CUAC/CUHP)
  with a certified cooling capacity between 5.5 ton (65,000 Btu/h) and 63.5 ton
  (760,000 Btu/h)
- (B) Water-cooled and evaporatively-cooled commercial air conditioners that are subject to DOE's energy conservation standard
- (C) Water-source heat pumps that are subject to DOE's energy conservation standard
- (D) Single package vertical air conditioners and heat pumps
- (E) Packaged terminal air conditioners and heat pumps (PTAC/PTHP)
- (F) Computer room air conditioners that are subject to DOE's energy conservation standards; and
- (G) Variable refrigerant flow multi-split air conditioners and heat pumps (VRF)

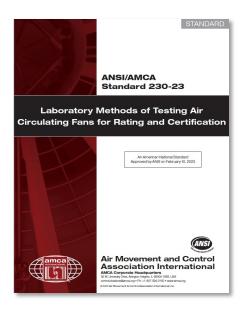


- Applies to manufacturers, which include business entities that package components into a "fan"
- Covers fans imported for sale in the USA and U.S. territories
- Canada usually adopts DOE efficiency regulations in time
- Deadline for compliance was Oct. 30, 2023
  - "Voluntary" representations of "energy usage" and "energy efficiency"
  - 34 companies asked for and received extension to April 29, 2024

- Energy Usage and Efficiency Representations Covered
- Explicitly:
  - GFB: FEI and the intermediary parameter, Fan Electrical Power (FEP)
  - ACF: cfm/W
- Implicitly: Parameters measured or calculated using the test procedure:
- Examples:
  - Brake horsepower
  - Total efficiency
  - Static efficiency
  - Airflow
  - Etc.

- GFB Method of Test
  - ANSI/AMCA Standard 214-21\*
  - FEI is regulatory metric
  - AMCA 214 references methods of test and integrates portions of other AMCA standards to make it easier for regulators to use FEI
- ACF Method of Test
  - ANSI/AMCA 230-23
  - Measuring and calculating cfm/W at maximum speed





\* Bonus slides have complete references to AMCA standards

- Manufacturer impact: Published fan information (ratings/representations) must conform to test procedure by October 30, 2023:
  - Selection software
  - Websites
  - Labels and Markings
  - Hardcopy literature (catalogs, data sheets) can be phased out
- There are no filing requirements
- Enforceable DOE can levy fines and civil penalties for noncompliance up to \$584 per product per day from date of noncompliance



# DOE Energy Std- extra slides

# DOE Proposed Standards for GFB

Equipment Class	Fan Energy Index (FEI)	
Axial Inline	1.18	
Axial Panel	1.48	ΨΛ 'ff = -1 -1 '414 -
Axial Power Roof Ventilator	0.85	*A if sold without a drive
Centrifugal Housed	1.31	divo
Centrifugal Unhoused	1.35	*A*B if sold with a drive
Centrifugal Inline	1.28	A O D
Radial Housed	1.17	A & B are adjustment parameters
Centrifugal Power Roof Ventilator - Exhaust	1.00	parameters
Centrifugal Power Roof Ventilator - Supply	1.19	

## DOE Levels Vs. Energy Code and Title 20

- FEI is a ratio of a baseline fan vs. fan being considered
- Baseline Fan has an FEI = 1.00
- Fan with FEI 1.10 is 10% more efficient at the design airflow and pressure
  - Axial Panel Fan: 1.48 is almost 50% more efficient than currently required
  - Centrifugal Unhoused: 1.35 is 35% more efficient than currently required



# DOE Regulation: How to Review and Comment

... Updated from Member Alert sent Jan. 19

## Obtain the Documents

- Federal Register NOPR, published Jan. 19, 2023
  - This is the official "file of record."
  - Link will automatically open the file as PDF in browser window
  - Use "File Save As..." command and name the file.
    - This will download the file as a PDF on your computer
  - Three-column format, 167 pages

Federal Register page 3714 is PDF Page 1

3714 Federal Register / Vol. 89, No. 13 / Friday, January 19, 2024 / Proposed Rules

DEPARTMENT OF ENERGY

10 CFR Parts 429 and 431

[EERE-2022-BT-STD-0002]

Interested persons are encouraged to submit comments using the Federal eRulemaking Portal at www.regulations.gov under docket number EERE-2022-BT-STD-0002.

For further information of the following formation of the

Follow the instructions for submitting

submit a comment, review

<u>Technical Support Document</u>

• Link will go to page where you can download PDF from the DOE docket

RIN 1904-AF40

Large document

# To Attend Public Meeting In-Person or Online

- Wednesday, February 21, 2024, from 10:00 a.m. to 4:00 p.m.
  - Location: U.S. Department of Energy, Forrestal Building, Room 6E-069, 1000 Independence Avenue, SW, Washington, DC 20585.
- To attend in-person
  - Send email to appliance\_standards\_public\_meetings@ee.doe.gov
  - U.S. citizenship recommended
  - Send email to <a href="mivanovich@amca.org">mivanovich@amca.org</a> for advice on how to visit DOE HQ
- <u>Click here</u> to register for the webinar IN ADVANCE.
  - DOE treats online comments/questions as if delivered in-person
  - Event is recorded. Transcriptions and slides posted to docket

Note: Pages are "PDF" pages, not "Document" pages shown on bottom of documents

- Minimum Time Available and Less Technical Expertise
  - Read the regulatory language
    - This is what will appear in the Code of Federal Regulations when FINAL.
    - PDF Pages 157-162
  - Read the synopsis (Section I)
    - Overview of the DOE's logic and justifications
    - PDF Pages 2-21

### **Moderate Time and Expertise**

- 1. Read the technology options
  - How DOE thinks fans can be made more efficient by manufacturers
  - Table IV-7 is important
  - PDF pages 46-49

### 2. Read the screening analysis

- How DOE picked the technology options to include in the proposed energy levels
- Table IV-8 is important
- PDF page 49

#### **Moderate Continued**

- 3. Read the engineering analysis
  - Costs are associated with increased efficiencies and what screened-in technology(s)
    each efficiency level (EL) is based on.
  - PDF pages: 50-69
- 4. Read the energy-use analysis
  - How DOE determines annual energy use, which is used to calculate operating costs and savings from higher EL
  - PDF pages: 69-72
- 5. Read the life-cycle-cost and payback-period analyses
  - How DOE justifies the selected EL/trial standard levels.
  - PDF pages 73-78

### To Research DOE Technical and Economic Analyses

- Moderate Guidelines Plus:
  - Read sections of Technical Support Document (TSD) that appeal to you
    - Has all the technical details associated with the rulemaking
    - Global review of fan regulations
    - Other interesting and useful background information.