

## Public Comment CE140-16 WILLIAMS-B :

**Proponent : Jeremiah Williams, representing U. S. Department of Energy (jeremiah.williams@ee.doe.gov) requests Approve as Modified by this Public Comment.**

**Replace Proposal as Follows:**

### **2015 International Energy Conservation Code**

**C403.2.6 Ventilation.** Ventilation, either natural or mechanical, shall be provided in accordance with Chapter 4 of the *International Mechanical Code*. Where mechanical ventilation is provided, the system ~~shall provide the capability to reduce the outdoor air supply to the minimum required by Chapter 4~~ comply with one of the *International Mechanical Code* following:

1. The ventilation design minimum system outdoor airflow rate shall not exceed 135 percent of the minimum outdoor airflow rate required by Chapter 4 of the *International Mechanical Code*.
2. Dampers, ductwork and controls shall be provided that allow the system to supply not more than the minimum system outdoor airflow rate required by Chapter 4 of the *International Mechanical Code*, with a single setpoint adjustment.
3. The system shall utilize energy recovery complying with Section C403.2.7. The exceptions of Section C403.2.7 shall not apply.

Exception: The outdoor airflow rate is not limited during air economizer operation in accordance with Section C403.3.3 or demand controlled ventilation operation in accordance with Section C403.2.6.1.

**Commenter's Reason:** This proposal has been revised for language clarity based on SEHPCAC feedback. Since the new requirement calls for a configured condition rather than a capability, an exception was added to make it clear that air economizer or demand controlled ventilation operation did not violate this provision. In addition the original IECC requirement that the system have the capability to reduce to the minimum required by the International Mechanical Code (IMC) was added as an option. This option is also provided in ASHRAE 90.1-2016, and while not as strict as the original proposal, it does ensure that the minimum outside air capability is available to a future building owner without significant additional cost.

The phrase "or applicable codes or accreditation standards" is removed from the prior proposal, as these alternative ventilation basis are already covered in the IMC.

The original reason statement describing the benefits of limiting ventilation to a reasonable amount above the IMC still applies.

**Bibliography:** See original reason statement.