

Public Comment RE123-16 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

R403.7 Heat recovery ventilation In climate zones 6, 7, and 8, buildings shall be provided with a heat recovery or energy recovery ventilation system. The system shall be balanced to provide a sensible heat recovery efficiency of not less than 65 percent determined in accordance with CSA 439 at 0 °C (32 °F) and at a system net airflow equal to or greater than the design whole-house mechanical ventilation rate.

Modify standard(s) as follows: CAN/CSA-C439-09 (R2014) - Standard laboratory methods of test for rating the performance of heat/energy-recovery ventilators.

Commenter's Reason: Based on discussion at the Committee Action Hearing, this Public Comment makes four changes to the original proposal:

1. Corrects the confusing mix of Prescriptive and Mandatory provisions by moving this proposed change to a new (prescriptive) subsection in its entirety.
2. Eliminates the fan efficacy requirements that were part of the proposal, in deference to efficacies established by RE121-16, which was approved by the Committee.
3. Reduces the proposal's required heat recovery efficiency based on CAH testimony showing that a 65% efficiency threshold would allow many more products to comply than would the original 70% threshold. As shown in the graphic, based on product data from the Home Ventilating Institute, the previous 70% cutoff allowed less than 43% of the available products to comply without using a performance tradeoff; the 65% cutoff increases that to more than 85% of available products. (See <http://www.hvi.org/proddirectory/>)
4. Adds a reference standard (CAN/CSA-C439-09 (R2014)) for determining the recovery efficiency. This standard was reviewed by ICC staff without issue in vetting RE117-16.

HRV/ERV Sensible Recovery Efficiency (From HVI-Certified Products Directory, accessed 19 July 2016)

