

R-6: HVAC Equipment Efficiency Verification (R303.1)

Summary: Require that relevant information on equipment be provided to the code official. This proposed change will help ensure the code official is able to conduct an effective inspection for code enforcement.

DOE proposal R-6 was revised on December 18, 2015.

Stakeholder Feedback: There were four public comments received for proposal R-6. Comments are summarized below, followed by a DOE review:

- One comment opposing the proposal in general and suggesting in the alternative that equipment already subject to FTC labeling requirements be exempted from the IECC's label requirement.

Review: The question of potential conflicts with FTC jurisdiction is a valid concern. DOE may modify its proposal to enable code officials to verify the necessary information without the necessity of a label.

- One comment suggesting the proposed text is vague and should collect additional information.

Review: DOE believes the proposed text clearly delineates the desired information.

- One comment questioning the need for information on the date of manufacture and noting that some equipment that already has labeling requirements does not have a requirement that the label be permanently affixed.

Review: Date of manufacture is relevant because the latest Federal requirements for some equipment (air conditioners) differ by region, so the appropriateness of equipment in certain locations may depend on the date of its manufacture.

- Once comment suggesting that domestic water heating equipment should be included in the proposal.

Review: DOE agrees that the information on water heaters would likewise be useful.

- In addition to the written comments, there was discussion at DOE's stakeholder meeting (Denver, 13 October 2015) regarding the general availability and appropriateness of the information requested on the proposed label (e.g., conflicts with FTC requirements, difficulties producing labels for paired components in split systems, etc.).

In response to these comments, DOE has revised its proposal to focus on the code official's basic ability to require that builders supply the necessary information without specifying additional equipment labeling.

=== IECC PROPOSAL:

Add a new section R303.1.5 as follows:

R303.1.5 Equipment rating and information. *The code official shall be permitted to require that the following information for HVAC and water heating equipment be provided:*

1. Rated efficiency
2. Date of manufacture
3. Where U.S. Department of Energy regulations (CFR Title 10, Part 430) provide for different efficiencies as a function of a geographic region or intended installation location, the geographic region or state where the equipment is intended to be installed for use.

Reason: Because HVAC equipment plays a crucial role in determining the overall efficiency of a residence, it is important that installed HVAC equipment have the expected efficiencies. This is especially important because of the addition of the Energy Rating Index (ERI) path in the 2015 IECC, and the need for code officials to know the installed efficiencies in order to verify compliance under that path. Further, because new Federal requirements for some HVAC equipment varies by region, code officials have a greater need for ready access to the equipment ratings installed in homes. The proposed change assures that information about the equipment is readily available.

Energy Savings: The proposal is not expected to produce energy cost savings.

The U.S. Department of Energy (DOE) develops its proposals through a public process to ensure transparency, objectivity and consistency in DOE-proposed code changes. Energy savings and cost impacts are assessed based on established methods and reported for each proposal, as applicable. More information on the process utilized to develop the DOE proposals for the 2018 IECC can be found at: <https://www.energycodes.gov/development/2018IECC>.

Cost impact: This change has no direct cost impact.

Cost-effectiveness: This change is cost-effective in that it is expected to provide neutral energy impact and has no direct cost impact.