

DOCKETED

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Project Title:	Air Filters
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Title 20 Air Filter Requirements

Additional submitted attachment is included below.



19 December 2022

California Energy Commission
Docket Unit
Docket No.20-AAER-02
715 P Street, MS-4
Sacramento, CA 95814

RE: Docket No. 20-AAER-02, Express Terms for Air Filters, 3rd 15-day Public Comment Period

Dear CEC Staff,

HVI has submitted multiple comments to this docket requesting that the draft language be modified to clarify that the scope of CEC's proposed regulatory language excludes air filters that serve residential ventilation systems. This interpretation aligns with the original scope of the proposed regulatory language, docketed on March 24, and has been confirmed in consultation with CEC staff.

HVI appreciates that CEC has not implemented the suggested modifications to the draft language, based on restrictions to the scope of the rulemaking and based on the suggested language being "redundant." Understanding that CEC believes the existing language to be clear in this regard, HVI requests that, within CEC's public comments and responses document that will accompany this rulemaking, CEC provide responses to the following questions:

1. What is meant by "ducted system," as referenced in the definition of air filter (e.g., is it "ducted system" as defined in Section 1602(c) of Title 20?)?
2. Are filters that serve residential ventilation systems (i.e., systems certified by HVI and referenced by Title 24 through reference to ASHRAE 62.2) excluded from the scope of this rulemaking?

Thank you in advance for documenting these clarifications as part of the rulemaking.

Kind regards,

A handwritten signature in blue ink that reads 'Jacki Donner'.

Jacki Donner, CEO/Secretary

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