Based on my reading of the bill and the comments submitted to date, I'd suggest we don't speak to the issue of regional standards in the letter for the following reasons:

- the bill only allows the Secretary to establish regional standards, it does not require
- raising this issue could distract the reader from our primary concern, i.e. requiring DOE to develop a building energy standard if ASHRAE doesn't make the 2010 target
- potential hassles with some of our own "constituents"

I don't view the last one as a great reason, given the sensibility of regional requirements as they relate to real energy use, but I simply don't think we need to make that argument here.

For what its worth,

Andy
on the website: http://www.hdac-des-pier.com/results.html. In a nutshell they showed 35% peak savings and over 20% in annual energy usage. It is hard to argue with the numbers.

Since the manufacturers stand united against regional standards Kent and ASHRAE are in a tough position to take a stand on this. However I am not similarly burdened and I see this as an issue that has large environmental consequences. The equipment manufactured for the humidity of SE is simply not optimized for operation in the dryer climates west of the Rockies. This inconvenient truth shields a huge opportunity for energy and demand savings. In my opinion regional standards should be considered if we are serious about achieving our energy efficiency goals.

- Mark
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Reaching New Heights with ASHRAE at its 2008 Winter Meeting,
Jan. 19-23, New York City. Registration is now open
at www.ashrae.org/newyork

From: Kennedy, Steve D. [mailto:SDKENNED@southernco.com]
Sent: Tuesday, September 25, 2007 11:01 AM
To: Ramspeck, Claire
Subject: RE: Regional Standards

Claire,

As I understand it, the regional standards, as shown in the energy bill, refer to NAEC regulated equipment (mostly residential) where ASHRAE already defers to DOE and just copies the current DOE standards into 90.1 and 90.2. Also, absent specific legislation to the contrary, DOE appliance efficiency standards include a "one-way ratchet" - for any given appliance, standards may be raised or kept the same but may NEVER be lowered.

The big issue is that you can justify a higher standard on a regional basis (i.e. 90% gas furnaces for climate zones 4 and above) that could not be justified on a national basis, including areas like Florida with minimal heating needs.
If you can get around the fact that there are a lot of our influential members have day jobs at the equipment makers, I don't see why ASHRAE as an organization should oppose it. Having regional appliance standards is no more harmful to the concept of national building code standards that requiring greater insulation levels in zone 8 than zone 3.

Steve