



American Council of Engineering Companies of New York

DOB Comments on Energy Audits 3/12/2019

The American Council of Engineering Companies of New York (ACEC New York) represents close to 300 consulting engineering and affiliate firms throughout New York State, with a concentrated presence in New York City. Our members plan and design the structural, mechanical, electrical, plumbing, civil, environmental, fire protection and technology systems for the City's buildings and infrastructure.

ACEC New York appreciates this opportunity to share our following comments regarding the Department's of Buildings (DOB) proposal to amend section 103-07 of Title 1 of the Rules of the City of New York relating to energy audits and retro-commissioning and to correct a cross-reference in section 102-03 of Title 1 of the Rules of the City of New York:

- Page 6 of the proposal, Section 5 states that "Operating steam system pressure (cut-out setting) should not be more than 3 psig for low pressure steam heated buildings." Low pressure steam is defined in the mechanical code as up to 15 psig, so this requirement contradicts standard terminology. The line item should be adjusted to, "Operating steam system pressure (cut-out setting) should not be more than 3 psig for low pressure steam heated buildings which are designed to operate at this pressure. Where a higher operating steam system pressure is selected, the CFR should specify existing equipment and/or systems which requires this higher operating pressure."
- Page 10 of the proposal requires that all piping be insulated "in accordance with the New York City Energy Conservation Code." This should be modified to state "in accordance with the New York City Energy Conservation Code in effect at the time of construction."
- Page 11 of the proposal, steam trap testing requirements have been adjusted to require that 50% of non-common areas be tested to verify for proper function. This requirement will not be achievable in any multi-family building. If the ruling is intended to mandate implementation of only options B or C, this should be explicitly stated, as the current form places the burden of enforcement inappropriately on the energy auditor.
- Also on Page 11, the 30° F temperature difference between supply and return piping is not always appropriate. The specific temperature should be changed to state, "supply and return piping surface temperatures must have a temperature differential sufficient to confirm effective operating of steam traps in system."
- Page 13 of the proposal, provision (4)(ii), add the term "excessive" as follows: "An inspection must be conducted in common areas to confirm that all windows and doors are in good condition and not broken resulting in **excessive** air infiltration. Where any door or window is allowing for **excessive** air infiltration, the condition must be corrected and the post correction condition must be documented in the retro-commissioning report."
- Note: The initial Local Law 87 requires that "The HVAC distribution systems, both air and water side, are balanced." This update provides significant clarity on other ambiguous requirements in the initial Local Law, but does not address this requirement. Further clarification would be beneficial.

Thank you for considering these comments. If you have any questions or would like to meet to discuss these points with representatives of our Energy Codes Committee, please let us know.

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