

# LAWRENCE G. SPIELVOGEL, INC. CONSULTING ENGINEERS

21506 VALLEY FORGE CIRCLE KING OF PRUSSIA, PA 19406 PHONE 610-783-6350 FAX 610-783-6349 EMAIL spielvogel@comcast.net

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To the PAPUC

Re: Docket Nos. M-2008-2069887 and M-00051865

To Whom It May Concern:

As a member of the ANSI/ASHRAE/IESNA Standard 90.1 committee for 19 years and recently Chair of the committee, I believe that I can speak with some authority about the technical content of the January 2009 draft of the PAPUC Technical Reference Manual.

The technical content and almost all of the references are nor relevant or representative of the majority of buildings in Pennsylvania. For just one of thousands of examples, a high efficiency motor in a church air conditioning system in Philadelphia is likely to operate about 100 to 200 hours per year, while that exact same motor in a police station air conditioning system is likely to operate 8,760 hours per year, yet Table 23 requires using 2,865 EFLH per year.

The PAPUC should be ashamed publishing this draft.

Very truly yours,

LAWRENCE G. SPIELVOGEL, INC.

*L. G. Spielvogel*

Eur Ing Int PE Larry Spielvogel, PE, CEng, FASHRAE, FCIBSE, FSLI

LGS:jca