

Dear ROSEMARY CHIAVETTA,

I have been speaking with Joseph Sherrick regarding the open comment period on the 2021 Technical Reference Manual and I have comments to make about that. I would appreciate your help in getting these comments to the appropriate person and letting me know that you have received this.

PENNSYLVANIA PUBLIC UTILITY COMMISSION

**Implementation of the Alternative Energy Portfolio Standards Act of 2004:
Standards for the Participation of Demand Side Management Resources—
Technical Reference Manual 2021 Update; Doc. No. M-2019-3006867**

**[49 Pa.B. 2074]
[Saturday, April 27, 2019]**

I appreciate your help and thank you for your time.

Brian McGowan

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**Implementation of the Alternative Energy Portfolio Standards Act of 2004:
Standards for the Participation of Demand Side Management Resources—
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I would like to offer comments in response to the “Additional Residential EE&C Measure Protocols” section of the Tentative Order and “Additional C&I measures”.

I would like to suggest that the commission develop a measure protocol for inclusion in the Final 2021 TRM Manual.

I represent a woman/veteran owned company which manufactures heat exchangers which reduce the amount of energy needed to heat water and cool buildings.

The Drain Water Heat Exchanger can reduce the amount of energy needed to heat water by 30% or more simply by recovering energy from drain water that would normally be wasted down the drain.

These products are currently listed in the rebate programs of utilities in other states around the country and I would like to suggest they would be pertinent to be listed in the rebate programs of utilities in Pennsylvania as well. I have listed some of these below.

I believe the Drain Water Heat Exchangers would be best listed under Section 2.3.1 – Heat Pump Water Heaters, Section 2.3.2 – Solar Water Heaters, Section 2.3.3 – Fuel Switching: Electric Resistance to Fossil Fuel Water Heater

I believe the AirFox desuperheater type devices would be best listed under Section 3.2.1 – HVAC Systems. These can also be used in restaurants or any place that has refrigeration as they work equally well on refrigeration systems as AC systems.

I will leave all of that up to you though as I have no idea how all of this works. I only know I represent a line of products that actually do work and reduce energy by a fair amount and other states have them listed in their rebate programs with success. I also believe if we are going to pursue efficiency we have to at the very minimum stop literally throwing perfectly good energy right down the drain. I hope you will seriously consider including this in your TRM. If you have any questions or need any further information please do not hesitate to call or email. Email works best as I can attach further information to that. If you need I can actually come to your location and show you these items and talk about them. Don't forget to see how other states do this below.

Thank you for your time.
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Middle of page right hand side waste heat recovery.

<http://www.diversepower.com/energy-tools/rebates/>

Bottom of the sheet heat recovery water heater system

<https://www.georgiapower.com/content/dam/georgia-power/pdfs/residential-pdfs/heip-singlefamily-2019.pdf>

<https://www.waltonemc.com/index.php/home/rebates/>

Drain Water heat recovery device installation.

https://accel.minnesotaenergyresources.com/home/water_heating_rebates.aspx

In Florida about half way down heat recovery units. We installed 4 AirFox units in a 2000 inmate prison and they saved \$80,000.00 in energy expenses the first year and they were able to shut down 4 of their 5 boilers. I can point you at a writeup for that if you are interested.

https://www.jea.com/Business_Resources/rebates_for_businesses/Water_Heating_Rebates/

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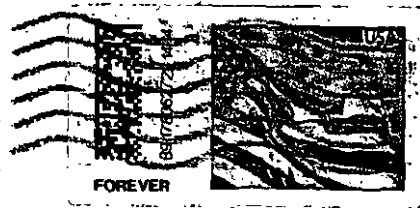
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Attn: Rosemary Chiavata
Docket# M-2019-3006867