



**NATIONAL AIR DUCT CLEANERS ASSOCIATION**

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Date: March 24, 2008

To: California Investor Owned Utilities (IOUs):  
Pacific Gas and Electric Company  
San Diego Gas and Electric Company  
Southern California Edison Company  
Southern California Gas Company

Re: *California Energy Efficiency Strategic Plan* (Supplemented Draft),  
Rulemaking 06-04-010 dated March 6, 2008

The National Air Duct Cleaners Association (NADCA) has reviewed the draft California Energy Efficiency Strategic Plan and commends the California Investor Owned Utilities, the California Public Utility Commission, the California Energy Commission, and contributing stakeholders, for their combined efforts to address California's needs for energy efficiency.

NADCA supports the creation of a stakeholders committee to allow for collaboration among interested stakeholders and the exchange of technology that will result in greater energy efficiency. The Association considers maintenance and restoration of HVAC systems to be a critical element of energy conservation. In fact, NADCA is currently engaged in a two-year, quarter-million dollar research project to demonstrate the connection between HVAC cleaning/maintenance and improved energy efficiency. Considering the fact that all HVAC systems become fouled over time, even with optimum filtration and maintenance, and given the estimates that clean coils alone can improve energy efficiency by 30% <sup>(1)</sup>, NADCA believes HVAC cleaning to be a major factor contributing to improved energy efficiency.

NADCA respectfully requests that the standard, *Assessment, Cleaning & Restoration of HVAC Systems (ACR 2006)*, be adopted by California and referenced into Section 6, "Heating, Ventilation & Air Conditioning" (page 58) of the *California Energy Efficiency Strategic Plan*. The ACR standard, available for free download from NADCA's Web site, has been published since 1992 and is widely adopted throughout the United States for residential, commercial, industrial and marine HVAC cleaning and restoration projects. In addition, please note that NADCA was recognized by the American National Standards Institute (ANSI) as an Accredited

Standards Developer in 2007 and develops standards in accordance with ANSI's essential requirements for openness, balance, consensus and due process. As such, stakeholders from California are encouraged to participate in development of the next edition of this standard – projected to begin within the next 60 days.

NADCA welcomes the opportunity to contribute to the success of California's energy efficiency initiatives. Thank you for consideration of our comments and for your efforts thus far to develop a comprehensive energy solution for the State of California.

Best regards,



John M. Schulte  
Executive Director  
National Air Duct Cleaners Association

(1) "Actions You Can Take to Deduce Cooling Costs", Federal Energy Management Program, U.S. Department of Energy. ([http://www1.eere.energy.gov/femp/pdfs/om\\_cooling.pdf](http://www1.eere.energy.gov/femp/pdfs/om_cooling.pdf))

#### *About NADCA*

*Founded in 1989, NADCA is an international not-for-profit trade association representing nearly 1,000 contractor businesses in 31 countries, specializing in inspection, maintenance and restoration of HVAC systems. NADCA's standard, Assessment, Cleaning & Restoration of HVAC Systems (current version – ACR 2006), has been published since 1992 and is widely adopted throughout the United States for residential, commercial and industrial projects. The Association also provides training and personnel certification in inspection, cleaning and microbial remediation of HVAC systems.*