**Comment/Explanation\*:***Include your justification for your proposed change to the draft standard below.*
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The proposal would require 75 in2 of net free area (NFA) per 100 watts of compressor power.

Compressors generally report a power input, mass flow rate, and capacity, using methodology from AHRI 540.

Rheem understands “power” to mean “power input,” not “capacity.” Rheem notes that California’s recent Title 24 updates added NFA requirements based on “capacity” not “power input” to Section 110.3. Capacity is more appropriate than “power input” as it directly relates to the energy moved from the air to the water. These provisions also defer to manufacturer literature. Rheem recommends aligning these provisions with the already established provisions in CA.

**Proposed Change to the Draft Standard\***
*Use “strikethrough” and “underline” formatting to indicate all proposed changes. Changes must be shown with “hard-formatting” strikethrough and underline, not “track changes”.*

*Use a color other than red to indicate proposed changes to the draft.*\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

ii. The enclosed space containing the water heater is verified to have a total net free opening area to an adjacent heated or conditioned space that is greater than or equal to the net free opening area recommended by the manufacturer, or if there is no manufacturer recommendation, 125 in2 plus 25 in2 per kBtu per hour of compressor capacity ~~of no less than 75 in~~~~2~~ ~~per 100 watts of compressor power~~, using any combination of grilles, louvers, door undercuts, or a louvered door. Where the compressor capacity ~~power~~ is not specified by the manufacturer, the total net free opening area shall be no less than 560 in2.