Comment from Shailesh Desai, SDCI, received 8/13/20

Data Center MLC 2019 version ASHRAE 90.4

Please change the referenced edition of ASHRAE 90.4 from the 2016 to the 2019 edition.

The 2019 edition has different "Annualized MLC" requirements for *large* (over 300 kW) and *small* (300 kW and under) data centers. MLC means "Mechanical Load Component." In the 2019 edition, the maximum Annualized MLC for small data centers is 0.23, recognizing that smaller data centers operate under different constraints than large data centers. Some smaller data centers are as small as 10 kW, a single rack.

Also please delete the Washington state modifications to ASHRAE 90.4 from Section C403.1.3, as they are no longer necessary when referencing the 2019 edition.(Note that "Design MLC" is no longer calculated in the 2019 edition.)

C403.1.3 Data centers. *Data center systems* shall comply with Sections 6 and 8 of ASHRAE Standard 90.4 (2019)~~, with the following changes~~:

~~1. Replace design MLC in ASHRAE Standard 90.4 Table 6.2.1.1 "Maximum Design Mechanical Load Component (Design MLC)" with the following per applicable *climate zone*:~~

~~Zone 4C Design MLC = 0.22 Zone 5B Design MLC = 0.24~~

~~2. Replace annualized MLC values of Table 6.2.1.2 "Maximum Annualized Mechanical Load Component (Annualized MLC)" in ASHRAE Standard 90.4 with the following per applicable *climate zone*:~~

~~Zone 4C Annual MLC = 0.18 Zone 5B Annual MLC = 0.17~~

ASHRAE

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Standard reference number	Title	Referenced in code section number
ANSI/ASHRAE/ACCA		
Standard 127-2007	Method of Testing for Rating Computer and Data Processing Room Unitary Air Conditioners	C403.4.1
Standard 183—2007	Peak Cooling and Heating Load Calculations in Buildings, Except Low-rise Residential Buildings	C403.1.2
ANSI/ASHRAE/ASHE Standard 170-2017	Ventilation of Health Care Facilities	C403.1.1
ASHRAE—2016	ASHRAE HVAC Systems and Equipment Handbook—2004	C403..1.2
ISO/AHRI/ASHRAE 13256-1 (2011)	Water-source Heat Pumps—Testing and Rating for Performance—Part 1: Water-to-air and Brine-to-air Heat Pumps	Table C403.3.2(2)
ISO/AHRI/ASHRAE 13256-2 (2011)	Water-source Heat Pumps—Testing and Rating for Performance—Part 2: Water-to-water and Brine-to-water Heat Pumps	Table C403.3.2(2)
90.1—((~~2016~~)) 2019	Energy Standard for Buildings Except Low-rise Residential Buildings	C402.1.5.1, C407.3
90.4—((~~2016~~)) 2019	Energy Standard for Data Centers	C403.1.3
146—2011	Testing and Rating Pool Heaters	Table C404.2