

GEW50-14

603.4, 603.4.1

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Revise as follows:

603.4 Energy load type sub-metering. For buildings that are not less than 25,000 square feet (2323 m²) in *total building floor area* the electric energy use of the categories specified in Section 603.2 shall be metered through the use of sub-meters or other *approved*, equivalent methods meeting the capability requirements of Section 603.3.

603.4.1 Buildings less than 25,000 square feet. For buildings that are less than 25,000 square feet (2323 m²) in *total building floor area*, the electric energy distribution system shall be designed and constructed to accommodate the future installation of sub-meters and other *approved* devices in accordance with Section 603.4. This includes, but is not limited to, providing access to distribution lines and ensuring adequate space for the installation of sub-meters and other *approved* devices.

Reason: The two sections are being revised to limit sub metering to electric only. The imposition of sub metering for natural gas and other energy sources result in significant installation cost increases without any known energy conservation benefit. Electric energy sub metering can utilize utility rate structures and incentives to shed demand and control equipment operation scheduling, providing a economic benefit. Electrically driven equipment and systems vastly outnumber applications driven by natural gas and other energy sources. Electrically driven HVAC, refrigeration, lighting, pumps, fans, AV, plug loads, etc., offer economic opportunities for central motoring and control that sub meters could be used for. Natural gas and other energy source driven appliances mainly are space and water heating, and offer little control opportunities and no economic benefit for consumers and building users. While there may be some reporting applications that make sense for sub metering of natural gas and other energy sources, those opportunities do not justify code mandated installations.

Cost Impact: Will not increase the cost of construction.

GEW50-14: 603.4-CABOT753