



Comments of New York University

David Alonso
Vice President,
Facilities & Construction

Cecil Scheib, PE, CEM, LEED AP
Chief Sustainability Officer

Brian Burke
Director of Energy
Engineering

before

The New York City Department of Buildings (DOB)

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Thank you for the opportunity to submit comments on behalf of New York University (NYU) regarding DOB's proposed rules, which establish procedures for complying with annual greenhouse gas emissions limits for certain buildings.

As the University works to comply with Local Law 97 and continue in our decarbonization efforts, we submit the following comments and questions for DOB to consider as it implements the proposed new section 103-14 to Chapter 100 of Title 1 of the Rules of the City of New York:

- 1) QUESTION: Can DOB share information on the source for the requirement of 1.5 COP for single package vertical heat pumps? AHRI seems to require 3.0 (or 3.3 for smaller units) for several years now. (See pg. 7 of Notice of Public Hearing).
- 2) RECOMMENDED LANGUAGE CHANGE: The current language reads, "Note: Equipment and systems not listed in the table that otherwise meet the definition of beneficial electrification shall have a coefficient of performance (COP) for the system equivalent to greater than 1.5 when the outdoor dry bulb temperature is **5°F or lower**, where the COP of the system is calculated based on the energy required for all parts of the system to deliver the peak capacity." (See pg. 7 of Notice of Public Hearing).
 - The boldfaced phrasing does not have a logical interpretation from an engineering perspective, since the COP of equipment and systems may be different at different temperatures. As the intent of this note is that systems are required to run at a COP of 1.5 when outdoor dry bulb temp is 5F, not at -20F, or -40F, or -80F, **the words "or lower" should be removed, leaving only "at 5F"**.
- 3) NEED FOR ADDITIONAL CLARIFICATION: While laudably attempting to define "good faith", the existing language leaves many questions unanswered that would make compliance with this rule ambiguous, confusing, and potentially needlessly onerous. (See pg. 18 of Notice of Public Hearing, "Good faith efforts...")
 - For instance, without further definition, the requirement to submit "An inventory of all HVAC equipment, domestic hot water equipment, electrical equipment, lighting, and conveyance equipment serving the building, including the date of installation of such equipment" is unclear. One reading of this would be, for example, to include in the inventory of "all electrical equipment" every light switch, phone charger, laptop, light bulb, transformer, fan, and so forth, which would be impossible to produce in its exhaustive entirety. If these terms are defined elsewhere in the code or rules, that

reference should be made explicitly here; if not, much more specificity on what is required— and in what form it will need to be supplied—is needed.

Thank you again for the opportunity to submit comments. I would be happy to answer any additional questions DOB may have. (Please contact Konstantine Tettonis, NYU Government Affairs, kt1249@nyu.edu.)