

Request for Official Interpretation

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Reference:

This request for interpretation refers to the requirements presented in:

ANSI/ASHRAE/IES Standard	Number and Year:	90.1-2025, 90.1-2022, 90.1-2019, 90.1-2016, 90.1-2013
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Page Number(s): 72, 74, 76

Section(s): 6.2. Compliance Paths. 6.4 Mandatory Provisions, 6.4.1.4 Mandatory Provisions.

Table(s): N/A

Relating to: Applicability of Section 6.4.1.4 to equipment covered in all compliance paths

Background:

Summary of relevant sections of Standard 90.1:

- Section 6.2, “Compliance Paths,” requires mechanical equipment and systems providing heating, cooling, ventilating, or refrigeration to comply with Sections 6.2.1 and 6.2.2.
- “Section 6.2.1 Requirements for all Compliance Paths” requires mechanical equipment and systems to comply with Sections 6.1, 6.4, 6.7, and 6.8. There is an exception to 6.2.1(b), for the simplified approach. Section 6.4.1 has no charging language.
- “Section 6.4 Mandatory Provisions” sets forth the mandatory requirements for HVAC systems and equipment. Section 6.4.1 lists requirements for Equipment Efficiencies, Verification, and Labeling Requirements for HVAC equipment covered by the standard.
 - Section 6.4.1.1 covers “listed equipment” at standard conditions via Tables 6.8.1-1 through 6.8.1-21.
 - Section 6.4.1.2 covers “listed equipment” at non-standard conditions.
 - Section 6.4.1.3 states that equipment not listed in the tables referenced in Sections 6.4.1.1 and 6.4.1.2 may be used.
 - Section 6.4.1.4, “Verification of Equipment Efficiencies,” includes five options (a thru e) regarding verification of equipment efficiency information supplied by manufacturers.

We have received questions as to whether fans are required to meet the efficiency verification requirements of Section 6.4.1.4 because the only minimum efficiency requirements are called out in the prescriptive path, Section 6.5.

Note: Please provide background and supporting information here. State exactly what the requirements are and any conflicting information.

Interpretation 1:

The efficiency of all equipment that provides heating, cooling, ventilating, or refrigeration, whether included in the tables in Section 6.8.1 or not, must be verified in accordance with Section 6.4.1.4 where required to comply with Section 6.5.

Question 1:

Is interpretation 1 correct?

Answer 1:

Yes

Comments 1:

Section 6.2.1 “Requirements for All Compliance Paths” requires that Section 6.4 applies to all compliance paths. There is no charging language in Section 6.4.1 or Section 6.4.1.4 that limits the scope of efficiency verification requirements. Therefore, the requirements apply to equipment efficiencies listed in Section 6.5.

Interpretation 2: The efficiency of all equipment that provides heating, cooling, ventilating, or refrigeration, whether included in the tables in Section 6.8.1 or not, must be verified in accordance with Section 6.4.1.4 for all compliance paths in this standard.

Question 2: Is interpretation 2 correct?

Answer 2: Yes

Comments 2: Section 6.2.1 “Requirements for All Compliance Paths” requires that Section 6.4 applies to all compliance paths. There is no charging language in Section 6.4.1 or Section 6.4.1.4 that limits the scope of efficiency verification requirements. Therefore, the requirements apply to equipment efficiencies for all compliance paths.

Interpretation 3: Where the fan efficiency must meet the efficiency requirements of Section 6.5 or where the fan efficiency is part of the demonstrated performance used to comply with any other compliance path, fans that provide ventilation or move air to provide heating or cooling must comply with Section 6.4.1.4.

Question 3: Is interpretation 3 correct?

Answer 3: Yes

Comments 3: Fans that provide ventilation or move air to provide heating or cooling fall under the definition of equipment, and the requirements of Section 6.4.1.4 apply to equipment.

IC 90.1-2025-1

Approved on May 14, 2026

Note: Please provide your interpretation of the requirement(s). Present your interpretation in such a way as to allow for a yes or no answer by the applicable committee. The question below will be presented to the applicable committee for response.

Question:

Is this Interpretation No. 1 correct?

Is this Interpretation No. 2 correct?

Is this Interpretation No. 3 correct?

Note: This question will be presented to the applicable committee for response.

Answer:

Note: The cognizant Project Committee or Interpretation Committee will provide a yes or no answer.

Yes

Comments:

Note: The cognizant Project Committee or Interpretation Committee may provide additional comments.

Submit this form by e-mail, fax or mail to: Manager of Standards, ASHRAE, 180 Technology Parkway NW, Peachtree Corners, Georgia 30092, <mailto:standards.section@ashrae.org>, Fax: 404-321-5478.