November 11, 2016

Ms. Ashley Armstrong
Office of Energy Efficiency and Renewable Energy
Building Technologies Program
Room EE-5B
U.S. Department of Energy
1000 Independence Avenue, S.W.
Washington, D.C. 20585-0121


Dear Ms. Armstrong:

On behalf of the Air-Conditioning, Heating, and Refrigeration Institute (AHRI) members, we respectfully request that the U.S. Department of Energy (DOE) schedule a public workshop to discuss the notice of data availability (NODA) regarding energy conservation standards for commercial and industrial fans and blowers appearing in the Federal Register on November 1, 2016. Further, we request that DOE extend the public comment period for an additional 60 days.

A public workshop is crucial to our members understanding the Department’s proposed changes to the analysis which has changed considerably since the Appliance Standards and Rulemaking Federal Advisory Committee (ASRAC) Working Group (WG) negotiations concluded. Understanding the details of the changes is very important to our ability to properly comment on the rulemaking. Many of the proposed changes directly affect our members and it would be extremely helpful if the DOE would walk through the changes to this complex analysis.

AHRI is the trade association representing manufacturers of heating, cooling, water heating, and commercial refrigeration equipment. More than 300 members strong, AHRI is an internationally recognized advocate for the industry, and develops standards for and certifies the performance of many of the products manufactured by our members. In North America, the annual output of the HVACR industry is worth more than $20 billion. In the
United States alone, our members employ approximately 130,000 people, and support some 800,000 dealers, contractors, and technicians.

Thank you for the review of AHRI’s request for a public workshop and an extension of the comment period on this NODA. If you have any questions regarding this submission, please do not hesitate to contact me.

Sincerely,

Laura Petrillo-Groh, PE
Sr. Engineering Manager, Regulatory Affairs
Direct: (703) 600-0335
Email: LPetrillo-Groh@ahrinet.org