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June 15, 2015

Ms. Brenda Edwards
U.S. Department of Energy
Building Technologies Program, Mailstop EE-2J
1000 Independence Avenue SW
Washington, DC 20585-0121

Re: Energy Conservation for Program: Test Procedures for Pumps [*Docket Number EERE-2013-BT-TP-0055*]

Dear Ms. Edwards:

These comments are submitted by the Air-Conditioning, Heating, and Refrigeration Institute (AHRI) in response to the U.S. Department of Energy's (DOE) notice of proposed rulemaking (NOPR) on the new test procedure for Commercial and Industrial Pumps (Pumps) appearing in the *Federal Register* on April 1, 2015.

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.

AHRI supports the DOE's proposal to allow testing of the Variable Frequency Drive (VFD) to be in accordance with AHRI Standard 1210-2011, *2011 Standard for Performance Rating of Variable Frequency Drives* (AHRI 1210-2011). This proposal was also in line with the commercial and Industrial Pumps (CIP) Working Group recommendation and supports the proposed metric, which is a weighted average of measurements at specified load points and is similar to those load points specified in AHRI 1210. As DOE has recognized, any harmonics in the power system can affect the measured performance of the pump when tested with a motor or motor and continuous or non-continuous control. AHRI 1210-2011 specifies appropriate power supply tolerances so that both pump manufacturers and DOE enforcement testing can be confident with the establishment and verification of ratings of VFDs sold with pumps.

We would also like DOE to be aware that the VFD manufacturers are working to expand the scope of AHRI 1210-2011 to include a higher horsepower upper limit and to include additional load test points. These revisions are expected to make the standard even more applicable to supporting the extended product testing approach for commercial and industrial pumps.

AHRI appreciates the opportunity to provide these comments. If you have any questions regarding this submission, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'LPG', with a long horizontal flourish extending to the right.

Laura Petrillo-Groh, PE
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