

June 23, 2018

Mr. Antonio Bouza
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

Re: Request for Extension of Comment Period in Response to Department of Energy's
Request for Information Regarding the Test Procedure for Water-Source Heat Pumps
[Docket Number EERE-2017-BT-STD-0029]

Dear Mr. Bouza:

The Air-Conditioning, Heating, and Refrigeration Institute (AHRI) respectfully requests that the U.S. Department of Energy (DOE) extend the public comment period for an additional 60 days to provide stakeholders adequate time to properly respond to the request for information (RFI) regarding the test procedure for water-source heat pumps appearing in the *Federal Register* on June 22, 2018.

This RFI asks a great number of complex questions, not only on the relevant test procedure for the equipment, but also on the applicability of certain provisions from AHRI Standard 340/360-2015, *Standard for Performance Rating of Commercial and Industrial Unitary Air-Conditioning and Heat Pump Equipment* on water-source heat pumps. In order to provide the Department with a meaningful response, AHRI member companies will need the time to consider and, quite possibly, to conduct testing, in order to establish the applicability and impact of a different test procedure on their equipment.

AHRI is the trade association representing manufacturers of heating, cooling, water heating, and commercial refrigeration equipment. More than 300 members strong, AHRI is an 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 and water heating industry is worth more than \$44 billion. In the United States alone, the HVACR and water heating industry supports 1.3 million jobs and \$256 billion in economic activity annually.

Thank you for the review and consideration of AHRI's request for a 60-day extension of the comment period on this RFI. 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 stylized flourish extending to the right.

Laura Petrillo-Groh, PE
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