

June 3, 2013

Ms. Brenda Edwards
U.S. Department of Energy
Building Technologies Program
Suite 600
950 L'Enfant Plaza, SW
Washington, DC 20024

Re: Supplemental AHRI Comments on DOE Framework Document for Commercial and Industrial Fans and Blowers [Docket No. EERE-2013-BT-STD-0006/RIN 1904-AC55]

Dear Ms. Edwards:

These supplemental 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 public meeting and availability of the framework document appearing in the Federal Register on February 1, 2013.

We indicated in our May 2, 2013 letter that the framework document seems to suggest that there are no existing requirements for fans in HVAC applications. The only mention of ASHRAE Standard 90.1 in DOE's 79-page framework document is during the discussion of the Fan Efficiency Grade (FEG) requirements in Addendum u. However, the framework document fails to account for the following exceptions that are associated with those requirements:

- Fans that are part of equipment listed under 6.4.1.1 Minimum Equipment Efficiencies-Listed Equipment-Standard Rating and Operating Conditions.
- Fans included in equipment bearing a third-party-certified seal for air or energy performance of the equipment package.

We believe that DOE needs to adopt a similar approach and exempt products from the scope of this rulemaking that are subject to the above exceptions in ASHRAE Standard 90.1. Specifically, fans and blowers in the following HVAC products should be exempted from the scope of this rulemaking:

- Central station air handling units
- Room fan coil units
- Unit ventilators
- Liquid chilling packages that are covered by Table 6.8.1C and Section 6.4.1.2 of ASHRAE Standard 90.1
- Air-to-air energy recovery ventilation equipment
- Air cooled and evaporative condensers
- Electrically operated applied heat pumps that are covered by Table 6.8.1B of ASHRAE Standard 90.1. The equipment types associated with these products

include ground water source, ground water source water-to-water, and ground water source brine to water.

- Air control and distribution devices such as diffusers and constant or variable volume air terminals, and
- Commercial packaged air conditioning and heating equipment with cooling capacities $\geq 760,000$ Btu/h

Fans and blowers within these HVAC products should be excluded from the scope of this DOE rulemaking for the following reasons:

1. Efficiency metrics already exist for many HVAC systems that are not currently regulated by DOE. These efficiency metrics and the corresponding minimum equipment efficiencies are adequately captured in ASHRAE Standard 90.1. Regulating fans and blowers in these HVAC systems is duplicative and unnecessary. It is also important to note that both the February 1, 2013 DOE framework document and DOE's June 28, 2011 notice of proposed determination fail to account for the nationwide energy savings that has occurred thus far through the adoption of ASHRAE Standard 90.1.
2. In many instances, the performance of HVAC equipment is independently measured and verified through third-party verification programs, thereby instilling confidence amongst commercial/industrial building contractors and specifiers by enabling a fair comparison between various products. Third-party verified products undergo rigorous testing by independent laboratories and equipment and components are evaluated using the appropriate industry standard to confirm that published performance ratings are accurate. In the case of new buildings or substantial renovations, the equipment installed in the building is specified by the building or system designer. In many cases, the choice of model made by that person is based on whether the equipment is third-party certified. DOE should ensure that this rulemaking recognizes this common practice which not only ensures that products are rated accurately, but also lays emphasis on equipment performance during the selection process.

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

Sincerely,



Aniruddh Roy
Regulatory Engineer
Air-Conditioning, Heating, and Refrigeration Institute
2111 Wilson Boulevard, Suite 500
Arlington, VA 22201-3001, USA
Phone 703-600-0383
Fax 703-562-1942
aroy@ahrinet.org