

**Air-Conditioning, Heating, and Refrigeration Institute
American Council for an Energy-Efficient Economy**

March 2, 2015

To: Members of the Appliance Standards and Rulemaking Federal Advisory Committee (ASRAC)

Re: Negotiated Rulemaking on Commercial Packaged Air Conditioners and Commercial Furnaces

The Air-Conditioning, Heating, and Refrigeration Institute (AHRI) and the American Council for an Energy-Efficient Economy (ACEEE) are writing to respectfully request that the Appliance Standards and Rulemaking Federal Advisory Committee (ASRAC) consider a negotiated rulemaking for commercial package air conditioners and commercial furnaces at its upcoming meeting on March 19, 2015.

As you may know, the Department of Energy (DOE) recently released two notices of proposed rulemaking (NOPR) proposing minimum energy conservation standards for commercial package air conditioners and commercial furnaces. At the same time, manufacturers represented by AHRI and energy efficiency advocates including ACEEE, the Appliance Standards Awareness Project, Natural Resources Defense Council, Earthjustice, Northwest Energy Efficiency Alliance, Alliance to Save Energy plus the California Investor Owned Utilities entered into discussions to explore the feasibility of a negotiated rulemaking. The group, including representatives of the manufacturers, met a first time on January 8, 2015 and a second time on February 5th. We invited representatives of the Air-Conditioning Contractors of America (ACCA), the Heating Air-Conditioning Distributors International (HARDI), and the Department of Energy (DOE) to attend this second meeting and they participated.

There was a consensus among those who attended the meetings that both rulemakings will benefit from a negotiated process through ASRAC. There was a general belief that an ASRAC process will facilitate greater communication among stakeholders and very importantly, will provide the analytic support needed for a timely resolution of the rulemakings.

It is our hope that the ASRAC committee will look favorably at our request. Thank you for your consideration.

Respectfully submitted,

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