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March 23, 2017

The Honorable Rick Perry  
Secretary  
U.S. Department of Energy  
1000 Independence Avenue, SW  
Washington, DC 20585

Re: Energy Conservation Program: Test Procedures for Central Air Conditioners and Heat Pumps, Docket No. EERE-2016-BT-TP-0029

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Dear Mr. Secretary:

The Air-Conditioning, Heating, and Refrigeration Institute (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.

The manufacturers of central air conditioners and heat pumps within AHRI's membership account for more than 90 percent of all residential central air conditioners and heat pumps sold and installed in the United States. Those members and AHRI staff actively participated in the rulemaking that revised the test procedures for central air conditioners and heat pumps (ACTP), and also participated in the rulemaking negotiated through the Appliance Standards and Rulemaking Federal Advisory Committee (ASRAC) amending energy conservation standards for those products that also amended aspects of the test procedure.

It has come to our attention that you have been sent a letter regarding the ACTP which might incorrectly have been perceived as AHRI's position. AHRI and its members support the processes under which the ACTP rule was written. Through those processes, AHRI raised concerns with the rule and many of the technical issues were satisfied by the Department of Energy in the Final ACTP Rule, issued on January 5, 2017. While some concerns remain, AHRI is not seeking to delay or rescind the ACTP rule.

We look forward to working with DOE to address any concerns with this rule through the agency's standard processes and procedures.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen R. Yurek".

Stephen R. Yurek  
President & CEO

cc: Hon. Glenn Grothman  
U.S. House of Representatives

Hon. Lynn Jenkins  
U.S. House of Representatives

Hon. Ron Johnson  
U.S. Senate

Hon. Mike Kelly  
U.S. House of Representatives

Hon. James Lankford  
U.S. Senate

Hon. Patrick Meehan  
U.S. House of Representatives

Hon. Jerry Moran  
U.S. Senate

Hon. Markwayne Mullin  
U.S. House of Representatives

Hon. Scott Perry  
U.S. House of Representatives

Hon. Pat Roberts  
U.S. Senate

Hon. James Sensenbrenner Jr.  
U.S. House of Representatives

Hon. Kevin Yoder  
U.S. House of Representatives

Hon. James M. Inhofe  
U.S. Senate

Hon. Roger F. Wicker  
U.S. Senate

Hon. Jeff Flake  
U.S. Senate

Hon. Mike Gallagher  
U.S. House of Representatives

Hon. Steve Russell  
U.S. House of Representatives

Hon. Randy Weber  
U.S. House of Representatives