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April 26, 2017

Mr. Antonio Bouza
U.S. Department of Energy
Building Technologies Program, Mailstop EE-5B
1000 Independence Avenue SW
Washington, DC 20585-0121

Re: Energy Conservation Program: Energy Conservation Standards for Central Air Conditioners and Heat Pumps, Docket No. EERE-2014-BT-STD-0048

Dear Mr. Bouza:

These comments are submitted by the Air-Conditioning, Heating, and Refrigeration Institute (AHRI) in support of the U.S. Department of Energy's (DOE) direct final rulemaking (DFR) regarding energy conservation standards for central air conditioners and heat pumps (CAC) appearing in the *Federal Register* on January 6, 2017.

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 over 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 Appliance Standards and Rulemaking Federal Advisory Committee (ASRAC) negotiated rulemaking amending energy conservation standards for central air conditioners and heat pumps.

The ASRAC negotiations that are fully incorporated into the DFR resulted in an outcome that accomplishes several objectives. The effective date of the new standards is aligned with global commitments to reduce HFC refrigerant use. This allows manufacturers to streamline design cycles thus reducing both manufacturing and consumer costs. The rule's compliance date of 2023 provides certainty to manufacturers of standard levels through 2029, allowing predictability for manufacturer investments and further improving both manufacturer and consumer economics. The final rule maintains standards for niche product categories including: small duct high velocity products; space constrained products; and single package air conditioners and heat pumps. This reduces the scope of products requiring redesign and preserves these niche categories, an action

that protects consumers by ensuring the availability of replacement products and avoiding costly conversions, while also protecting small businesses competing in these niche areas.

It is important to note that the DFR is not a “midnight rule” of the last Administration, but rather a negotiated rule with broad stakeholder backing. Our manufacturers value the certainty the energy conservation standard provide through 2029 and support the final rule.

Sincerely,

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

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