



2111 Wilson Boulevard Suite 500 Arlington VA 22201-3001 USA
Phone 703 524 8800 | Fax 703 562 1942
www.ahrinet.org

October 27, 2014

Mr. John Cymbalsky
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 (DOE) Notice of Proposed Rulemaking (NOPR) for Small, Large, and Very Large Commercial Air Conditioning Equipment [Docket Number EERE-2013-BT-STD-0007]

Dear Mr. Cymbalsky

On behalf of the Air-Conditioning, Heating, and Refrigeration Institute (AHRI) members, representing 90% of the market affected by this rule, we respectfully request that the U.S. Department of Energy (DOE) extend the public comment period for an additional 60 days on the agency's request for comments on the notice of proposed rulemaking (NOPR) appearing in the Federal Register dated September 30, 2014. The comment period is currently set to close on December 1, 2014.

In light of the breadth of the NOPR and its highly technical nature and required analysis, AHRI believes it is reasonable for the DOE to provide an additional 60 days to submit comments. While it may be possible to develop general comments by the December 1, 2014 deadline, it will not be possible to adequately address in detail the issues the DOE seeks comment on.

The NOPR affects three different capacity sizes of commercial equipment: small, large and very large unitary air conditioners and heat pumps. Due to the complexity of these products and sizes, they must be analyzed separately, which requires substantially more time and effort.

These products are some of the most complicated and complex products regulated by the DOE, and to thoroughly analyze the efficiency improvement and economic justification analysis, additional time is needed to review the supporting documents and calculations. In addition,

AHRI respectfully requests that the spreadsheets and calculations used in the cost and efficiency analysis be provided for review and comment.

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. In North America, the annual output of the HVACR industry is worth more than \$20 billion. In the United States alone, our members employ approximately 130,000 people, and support some 800,000 dealers, contractors, and technicians

Thank you for the review of AHRI's request for an extension of the comment period on this NOPR, and for the request for the spreadsheets and calculations used in the cost analysis. 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 'Nick Mislak', with a long horizontal flourish extending to the right.

Nick Mislak
Engineering Manager Regulatory Affairs
Direct: 703-293-4844
Email: nmislak@ahrinet.org