

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

we make life better™

November 25, 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) Request for Information (RFI) for Energy Conservation Standards for Residential Central Air Conditioners and Heat Pumps [Docket Number EERE-2014-BT-STD-0048]

Dear Mr. Cymbalsky:

On behalf of the Air-Conditioning, Heating, and Refrigeration Institute (AHRI) members, we respectfully request that the U.S. Department of Energy (DOE) extend the public comment period for an additional 90 days on the agency's request for comments on the request for information (RFI) regarding energy conservation standards for residential central air conditioners and heat pumps appearing in the *Federal Register* on November 5, 2014. The comment period is currently set to close on December 5, 2014.

As noted in the RFI, the energy conservation standards for residential central air conditioners and heat pumps established by the 2011 Direct Final Rule will become effective on January 1, 2015. Our members have been spending a considerable amount of time preparing for the implementation of this regulation. In light of this, the RFI comment deadline is particularly ill timed and does not provide adequate time to answer all 15 questions for which DOE is seeking input on. Extending the comment period will allow AHRI members to focus on responding to this rulemaking and to start evaluating the impact of the 2011 Direct Final Rule.

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 RFI. If you have any questions regarding this submission, please do not hesitate to contact me.

Sincerely,

Laura Petrillo-Groh, PE

Engineering Manager, Regulatory Affairs

-GP

Direct: (703) 600-0335

Email: LPetrillo-Groh@ahrinet.org