

Appliance Standards Awareness Project

June 30, 2025

Ms. Julia Hegarty
Energy Efficiency and Renewable Energy
Building Technologies Office, EE-5B
1000 Independence Avenue SW, Washington, DC 20585

RE: Docket Number EERE–2022–BT–TP–0028: Proposed delay of product-specific enforcement provisions for central air conditioners and heat pumps

Dear Ms. Hegarty,

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP) on the proposed delay of product-specific enforcement provisions for central air conditioners (CACs) and heat pumps (HPs). 90 Fed. Reg. 22671 (May 29, 2025). We appreciate the opportunity to provide input to the Department.

In January 2025, DOE finalized updates to the current test procedure for CACs and HPs. The changes, which include a controls verification procedure (CVP) enforcement provision, are set to take effect on July 7. The CVP, which assesses whether the fixed control settings used in certification testing to determine the cooling and/or heating efficiency of CACs and HPs are representative of operation of the equipment under native controls, is an important enforcement tool that will enable DOE to ensure that variable-speed CACs and HPs can generally achieve their claimed efficiency when the equipment is operating as it would in the field.

In the current notice, DOE has proposed to delay the CVP enforcement provisions for CACs and HPs by one year until July 7, 2026 in response to comments from some manufacturers requesting a delay in order to conduct additional testing to validate the CVP. However, during the development of the AHRI standards 210/240-2024 and 1600-2024, which are the basis for DOE's test procedure final rule, the Department presented test data for 10 variable-speed HPs to support the tolerances on capacity and efficiency.¹ Furthermore, as DOE notes in the current notice, three major manufacturers support proceeding with the test procedure final rule as published without delay.²

DOE developed the CVP in collaboration with industry and presented data to support the selection of the tolerance criteria. Furthermore, implementing the enforcement provision will benefit consumers by helping ensure that manufacturers' efficiency claims are reasonable based upon the native operation of their equipment. We therefore encourage DOE not to delay implementation of the CVP enforcement provisions.

¹ 90 Fed. Reg. 1257-59 (January 7, 2025).

² 90 Fed. Reg. 22674.

Thank you for considering these comments.

Sincerely,

A handwritten signature in black ink that reads "Rachel Margolis". The signature is written in a cursive style with a large, stylized "R" and "M".

Rachel Margolis
Senior Technical Advocacy Associate
Appliance Standards Awareness Project