

Appliance Standards Awareness Project
American Council for an Energy-Efficient Economy
National Consumer Law Center

March 7, 2025

Dr. Pradeep Prathibha
U.S. Department of Energy
Office of 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: Final rule; Delay of Effective Date for the Test Procedures for Central Air Conditioners and Heat Pumps

Dear Dr. Prathibha:

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP), the American Council for an Energy-Efficient Economy (ACEEE), and the National Consumer Law Center, on behalf of its low-income clients (NCLC) on the final rule; delay of effective date for the test procedures for central air conditioners (CACs) and heat pumps. 90 Fed. Reg 9001 (February 5, 2025). We appreciate the opportunity to provide input to the Department.

DOE should not further delay the effective date of the CAC and heat pump test procedure final rule. In January 2025, DOE published a test procedure final rule for CACs and heat pumps following a public notice and comment period. The final rule incorporates by reference the latest industry standards, AHRI 210/240-2024 and AHRI 1600-2024, which were developed by a broad group of stakeholders. The final rule established near-term changes with updates to the existing Appendix M1 (which will be required for product testing 180 days after publication of the final rule) and long-term changes with the introduction of the new Appendix M2 (which will not be required for testing until the compliance date of any future updated standards based on the new metrics SCORE and SHORE).

The near-term changes include several important provisions to provide clarification to manufacturers on how to test their products and to better ensure that consumers have access to accurate information about efficiency performance. For example, the near-term changes include provisions for testing low-static blower-coil systems. Manufacturers of these low-static systems previously had to submit test procedure waivers to DOE to be able to test their products; the Department is required to amend its regulations to eliminate the need for the continuation of test procedure waivers.¹ The near-term changes also include a controls verification procedure (CVP) for variable-speed equipment, which will help ensure that the tested performance of variable-speed equipment reasonably reflects field performance.

¹ [10 CFR 430.27\(l\)](#)

While the delay of the effective date does not affect the compliance date of the amended test procedures, further delay would harm manufacturers by creating uncertainty regarding important clarifications that manufacturers need to test and certify their products.

Thank you for considering these comments.

Sincerely,



Rachel Margolis
Senior Technical Advocacy Associate
Appliance Standards Awareness Project



Matt Malinowski
Director, Buildings Program
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Economy



Berneta Haynes
National Consumer Law Center
(On behalf of its low-income clients)