

Appliance Standards Awareness Project  
American Council for an Energy-Efficient Economy  
Northwest Energy Efficiency Alliance

September 9, 2024

Mr. Lucas Adin  
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-STD-0015: Direct Final Rule for Energy Conservation Standards for Air-Cooled Commercial Package Air Conditioners and Heat Pumps**

Dear Mr. Adin:

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP), the American Council for an Energy-Efficient Economy (ACEEE), and the Northwest Energy Efficiency Alliance (NEEA) on the U.S. Department of Energy's (DOE's) Direct Final Rule (DFR) establishing amended energy conservation standards for air-cooled commercial package air conditioners and heat pumps (CUACs/CUHPs). 89 FR 44052 (May 20, 2024).

We strongly support the standards in the DFR. The standards reflect the recommendations of an Appliance Standards and Rulemaking Federal Advisory Committee (ASRAC) Working Group. The ASRAC Working Group finalized a term sheet on energy conservation standards on May 1, 2023, which was approved by ASRAC on October 17, 2023.

The amended standards are expressed in updated efficiency metrics, integrated ventilation, economizing, and cooling (IVEC) for cooling and integrated ventilation and heating efficiency (IVHE) for heating. These metrics improve the representativeness of the efficiency ratings and better capture total energy consumption of the equipment over the cooling and heating seasons. DOE adopted the new metrics and updated test procedure as part of a May 2024 Test Procedure Final Rule (89 FR 43986).

The savings from the standards are large; DOE estimates that they will reduce national energy consumption by 5.5 quadrillion Btus, cut carbon dioxide emissions by about 109 million metric tons, and provide net present value savings for purchasers of \$15.3 billion over 30 years of shipments.<sup>1</sup> For the smallest CUACs, which have the largest market share, a unit meeting the amended standard will use almost 23% less energy than one just meeting the current standard.<sup>2</sup>

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<sup>1</sup> <https://www.regulations.gov/document/EERE-2022-BT-STD-0015-0100>. p. 44055.

<sup>2</sup> DOE states that ACUACs with capacity greater than or equal to 65,000 and less than 135,000 Btu/hr that meet the new standards (TSL 3; efficiency level 4 in Table 7.5.1) will use an average of 6,653 kWh annually, while a unit just meeting the current standard will use an average of 8,597 kWh annually.  
<https://www.regulations.gov/document/EERE-2022-BT-STD-0015-0096>. p. 7-7.

Furthermore, the standards will provide large life-cycle cost (LCC) savings for purchasers, with short payback periods relative to the lifetime of the equipment.<sup>3</sup> The simple payback periods for small, large, and very large CUACs are 5.9, 3.5, and 1.1 years, respectively, while the average equipment lifetimes are between 21 and 30 years. The average LCC savings are \$1,380, \$2,488, and \$6,431, respectively.<sup>3</sup>

Thank you for considering these comments.

Sincerely,



Rachel Margolis  
Senior Technical Advocacy Associate  
Appliance Standards Awareness Project



Matt Malinowski  
Director, Buildings Program  
American Council for an Energy-Efficient  
Economy



Nicole Dunbar, PE  
Codes & Standards Engineer  
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<sup>3</sup> <https://www.regulations.gov/document/EERE-2022-BT-STD-0015-0100>. p. 44054.