Appliance Standards Awareness Project Natural Resources Defense Council

May 25, 2021

Mr. Jeremy Dommu U.S. Department of Energy Building Technologies Program, EE-5B 1000 Independence Avenue SW Washington, DC 20585

## RE: Docket Number EERE–2011–BT–DET–0045/RIN 1904-AC55: Request for Information for Coverage Determination for Commercial and Industrial Fans

Dear Mr. Dommu:

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP) and Natural Resources Defense Council (NRDC) on the request for information (RFI) for coverage determination for commercial and industrial fans. 86 Fed. Reg. 24752 (May 10, 2021). We appreciate the opportunity to provide input to the Department.

In the RFI, DOE requests comment on a potential definition of "commercial and industrial fan" identical to the definition of "fan" in ANSI/AMCA 214-2021.<sup>1</sup> We appreciate AMCA's efforts to incorporate input from a broad range of stakeholders in developing ANSI/AMCA 214-2021, which builds on the work of an Appliance Standards and Rulemaking Federal Advisory Committee (ASRAC) working group. We support DOE adopting a definition for "commercial and industrial fan" identical to the definition of "fan" in ANSI/AMCA 214-2021 and believe that this definition accurately describes equipment generally understood as commercial and industrial fans.

Thank you for considering these comments.

Sincerely,

Joanna Mares

Joanna Mauer Technical Advocacy Manager Appliance Standards Awareness Project

Di B. hill

David Goldstein Energy Co-Director, Climate and Clean Energy Program Natural Resources Defense Council

<sup>&</sup>lt;sup>1</sup> 86 Fed. Reg. 24754.