

**Appliance Standards Awareness Project
Northwest Energy Efficiency Alliance
American Council for an Energy Efficient Economy
NW Power and Conservation Council**

September 11, 2017

Mr. James Raba
U.S. Department of Energy
Building Technologies Program
Mailstop EE-5B
1000 Independence Ave, SW
Washington, DC 20585-0121

Docket Number: EERE-2014-BT-TP-0054-0032
RIN: 1904-AD43

Dear Mr. Raba:

This letter contains the comments of the Appliance Standards Awareness Project in response to the Department of Energy's Request for Information (RFI) on Test Procedures for Compressors published August 8, 2017 (82 FR 37031).

We strongly recommend that DOE enforce the test procedure for certain varieties of compressors as published on January 4, 2017.

DOE's compressor test procedure rulemaking was transparent, inclusive, and exhaustive, and produced a final rule that both industry and energy efficiency advocates could endorse. The reason for this broad support is clear - the DOE compressor test procedure is based on ISO 1217:2009(E), "Displacement compressors—Acceptance tests¹", and when national technical regulation is based on established industry standards it minimizes the burden of regulation on industry and provides clear societal benefits. In agreement with the comments submitted by the Compressed Air and Gas Institute (CAGI) and Sullair LLC, ASAP and cos-signers endorse the test procedure for compressors as expressed in DOE's final rule.

DOE's decision, as stated in this RFI, to not enforce the compressor test procedure until December 30, 2017 is regrettable and sets an unfortunate precedent that introduces unnecessary uncertainty to the compressors market. We are aware that some parties have raised concerns with DOE's compressor test procedure final rule but it is rare for all parties to be satisfied with a final DOE rule and the compressor test procedure rulemaking is no exception. ASAP did not achieve all of our objectives with regard to either the new compressor test procedure or standard, but it is our belief that the benefits of DOE's final rule far outweigh any shortcomings. The critical comments from a limited number of parties which have been posted to the DOE website for this docket often express opposition to the regulation of the air compressor industry *per se*. However, there are unassailable benefits to both the compressor industry

¹ as amended through Amendment 1:2016

and compressors purchasers from a transparent, uniform requirement for measuring compressor energy performance.

Large air compressors are responsible for substantial energy costs at industrial facilities. This energy consumption constitutes a “second price tag” (in addition to the equipment purchase price) associated with ownership of the compressor. Today, compressor buyers can compare the purchase price of compressors offered by various manufacturers, but often cannot reliably compare information on the largest component of compressor operating expenses – the energy costs. After DOE’s final rule became effective on July 3, 2017 any representations a compressor manufacturer makes about the energy consumption of their products should be based on results obtained through the uniform compressor test procedure. For the first time, buyers have the ability to accurately assess the total cost of ownership for the full range of large air compressor choices in the marketplace.

In addition to providing critical information to the compressor marketplace, DOE’s compressor test procedure also undergirds minimum energy conservation standards that will deliver large electricity bill savings for businesses and industry across the U.S. The DOE’s forty-year-old system of test procedures and minimum standards has nurtured a blossoming of energy-efficient product options across a wide range of equipment categories, lowering the price of compliant products, lowering equipment operating costs, and saving money for buyers. Test procedures and standards have spurred manufacturer investments in higher performance in order to differentiate their products the marketplace. Coupled with active DOE monitoring of manufacturer claims and compliance enforcement, DOE’s compressor test procedure will help ensure that manufacturers who are committed to providing accurate, credible product performance information to their customers will no longer be undercut by performance claims by unscrupulous competitors.

DOE’s compressor test procedure also provides a level playing field for manufacturers that operate in a global market. The DOE test procedure was developed with significant input from the European Commission’s “Lot 31” compressor energy conservation standard development process. DOE’s compressor test procedure also provides a foundation for future voluntary compressor energy efficiency initiatives. In 2016 energy efficiency program providers across the U.S. spent \$1.7 billion on commercial and industrial or industrial-only energy efficiency (out of a total \$6.7 billion for energy efficiency across all sectors²). Much of that spending was in the form of incentives for the purchase of energy efficient lighting, motors, and other industrial equipment. Energy efficiency programs typically require a uniform test procedure to be in place before they will consider working with a product category. DOE’s compressor test procedure allows large air compressors to finally be able to participate in such programs.

Sincerely,



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² Figure 5, *Consortium for Energy Efficiency Annual Industry Report: 2016 State of the Efficiency Program Industry*.
<https://library.cee1.org/content/cee-2016-state-efficiency-program-industry>



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