

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

March 28, 2025

Mr. Jeremy Dommu
U.S. Department of Energy
Office of Energy Efficiency and Renewable Energy
Building Technologies Office, EE-2B
1000 Independence Avenue SW
Washington, DC 20585

RE: Docket Number EERE-2022-BT-TP-0019: Test Procedures for Compressors

Dear Mr. Dommu:

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP), American Council for an Energy-Efficient Economy (ACEEE), and the National Consumer Law Center (NCLC) on behalf of its low-income clients on the delay of effective date for the compressors test procedure final rule. 90 Fed. Reg. 11465 (March 7, 2025). We appreciate the opportunity to provide input to the Department.

DOE should not further delay the effective date of the compressors test procedure final rule. The amended test procedure contains three minor updates to the existing test procedure: two formula corrections and a clarification on the definition of “air compressor”;¹ manufacturers supported these updates.² Importantly, the delay of effective date does not affect the compliance date (July 16, 2025) for when testing under the amended test procedure becomes mandatory. Further delays would harm manufacturers by creating confusion and uncertainty around the appropriate test procedure to be used for testing and rating new compressor models.

Thank you for considering these comments.

Sincerely,



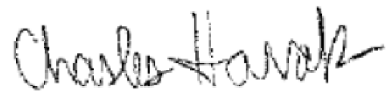
Jeremy Dunklin, PhD
Senior Technical Advocacy Associate
Appliance Standards Awareness Project



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

¹90 Fed. Reg. 5538, 5541 (January 17, 2025).

²90 Fed. Reg. 5546, 5549–5551 (January 17, 2025).

A handwritten signature in black ink that reads "Charles Harak". The signature is written in a cursive, slightly slanted style.

Charles Harak, Esq.
National Consumer Law Center
(On behalf of its low-income clients)