

Appliance Standards Awareness Project
New York State Energy Research and Development Authority

January 24, 2022

Ms. Catherine Rivest
U.S. Department of Energy
Office of Energy Efficiency and Renewable Energy
Building Technologies Office, EE-2J
1000 Independence Avenue SW, Washington, DC 20585

RE: Docket Number EERE-2017-BT-TP-0018: Supplemental Proposed Rule for Test Procedure for Direct Expansion-Dedicated Outdoor Air Systems

Dear Ms. Rivest:

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP) and New York State Energy Research and Development Authority (NYSERDA) on the supplemental notice of proposed rulemaking (SNOPR) for test procedures for direct expansion-dedicated outdoor air systems (DX-DOASes). 86 Fed. Reg. 72874 (December 23, 2021). We appreciate the opportunity to provide input to the Department.

We generally support DOE's proposed clarifications relating to specific components, and we support DOE's proposal not to adopt Appendix F of AHRI 920-2020. In particular, we agree with DOE's determination that testing specially built units would not provide representative ratings of DX-DOASes sold in the marketplace. We therefore support DOE's proposal to exclude the option of testing specially built units to determine representative values. We also support DOE's proposed clarification that, in cases where individual models include more than one of the listed specific components, the ratings must be representative of the lowest efficiency.

We urge DOE to exclude furnaces from the optional features list. In the NOPR, DOE states that it has tentatively determined that testing units with and without furnaces installed may result in differences in efficiency ratings. Despite acknowledging this difference in performance, DOE's justification for classifying furnaces as an optional feature is simply that it does not intend to deviate from the industry standard regarding the treatment of gas furnaces.¹ However, as DOE notes in the SNOPR, the statute requires that test procedures reflect a "representative average use cycle." We are concerned that DOE's proposal to classify furnaces as an *optional* feature will permit testing that generates ratings that are not representative of the typical energy use of many DX-DOASes. Furthermore, if furnaces are not required to be included in the test procedure, the test procedure will not capture DX-DOAS designs that reduce the pressure drop associated with the installation of a furnace, thus reducing energy consumption. We note that for commercial unitary air conditioners and heat pumps (CUACs/CUHPs), DOE's energy conservation standards account for the impact of the presence of a gas furnace by including different equipment classes for units with and without furnaces.²

Thank you for considering these comments.

¹ <https://www.regulations.gov/document/EERE-2017-BT-TP-0018-0028> p. 72880

² No Heating or Electric Resistance Heating and All Other Types of Heating.

Sincerely,

A handwritten signature in black ink that reads "Rachel Margolis". The signature is written in a cursive style with a large, prominent "R" at the beginning.

Rachel Margolis
Technical Advocacy Associate
Appliance Standards Awareness Project

A handwritten signature in blue ink that reads "Chris". The signature is written in a cursive style with a large, prominent "C" at the beginning.

Chris Corcoran
Team Lead – Codes, Products, & Standards
New York State Energy Research and Development Authority (NYSERDA)