

DOCKETED

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Comment Received From: Laura Petrillo-Groh
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AHRI Request for Extension of Comment Period

Additional submitted attachment is included below.

December 11, 2020

Mr. Michael J. Sokol
California Energy Commission
Docket Unit, MS-4
Re: Docket No. 20-FDAS-01
1516 Ninth Street
Sacramento, CA 95814-5512

(submitted electronically to Docket 20-FDAS-01)

Re: Request for Extension of Comment Period in Response to the December 14, 2020 Lead Commissioner Workshop on Senate Bill 49 Flexible Demand Appliance Standards and December 9, 2020 Staff Paper, Introduction to Flexible Demand Appliance Standards [Docket Number 20-FDAS-01]

Dear Mr. Sokol:

The Air-Conditioning, Heating, and Refrigeration Institute (AHRI) respectfully requests that the California Energy Commission (CEC) extend the public comment period to thirty (30) days after the originally scheduled deadline of January 4, 2020 to give time to properly respond to questions posed in the December 9, 2020 Staff Paper, *Introduction to Flexible Demand Appliance Standards*.

On December 14, 2020, CEC will hold the first workshop on the new SB 49 Flexible Demand Appliance Standards. AHRI and its members plan to participate in the workshop. As this is a new rulemaking, very little information had been provided to stakeholders regarding the products under scoping consideration and CEC's initial assessment, until the publication of the December 9th Staff Paper.

AHRI represents 332 air-conditioning, heating, and refrigeration equipment manufacturers. In North America, the annual output of the HVACR and water heating industry is worth more than \$44 billion. In the United States, the industry supports 1.3 million jobs and \$256 billion in economic activity annually. AHRI represents the majority of the manufacturers of North American water heater, central air conditioners, and heat pumps, all of which manufacture products within the scope of the rulemaking.

AHRI intends to provide CEC with thoughtful and substantive comments on this complex topic that will have a lasting impact to California and the public for years to come. However, the short comment window over major holidays would preclude our opportunity to respond adequately. AHRI and its members find it difficult to provide adequate and

complete comments to CEC given this comment period. It should be recognized that this is the first time that many of the products within in the scope of the proposal are being considered for flexible demand standards. Many key industry personnel required to respond to this staff paper will be unavailable to participate in comments. Industry coordination takes time to coordinate stakeholder meetings, generate drafts for member review, with time built-in for member comments and edits. The comment deadline of January 4 precludes any such opportunity. Given the potential impact to HVACR and water heating manufacturers, adequate time must be given to appropriately respond to the staff paper. A reasonable extension will enable industry to properly consider the complex questions and provide thorough response to CEC. This critical stakeholder feedback will help inform the staff report, estimated for the third quarter of 2021.

AHRI requests that CEC extend its comment deadline to thirty (30) days after the original deadline of January 4, 2020.

Thank you for the review and consideration of AHRI's request for a 30-day extension to this public comment period. If you have any questions regarding this submission, please do not hesitate to contact me.

Sincerely,



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