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Comment Received From: Laura Petrillo-Groh

Submitted On: 7/10/2018 Docket Number: 17-AAER-06

## **AHRI Request for Extension to Comment Period**

Additional submitted attachment is included below.

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July 7, 2018

Mr. Alejandro Galdamez California Energy Commission Docket Unit, MS-4 Re: Docket No. 17-AAER-06 1516 Ninth Street Sacramento, CA 95814-5512

Re: Request for Extension of Comment Period in Response to California Energy Commission's Draft Staff Report - Analysis of Efficiency Standards and Test Procedures for Commercial and Industrial Fans and Blowers [Docket Number 17-AAER-06]

## Dear Mr. Galdamez:

The Air-Conditioning, Heating, and Refrigeration Institute (AHRI) respectfully requests that the California Energy Commission (CEC) extend the public comment period for an additional 60 days to provide stakeholders adequate time to properly respond to the Draft Staff Report on Appliance Efficiency Regulations for Commercial and Industrial Fans and Blowers issued June 11, 2018.

This rulemaking has complex testing, labeling, and enforcement implications for embedded fans and requires data from fan suppliers to properly evaluate. Also, this proposal requires the industry to review several test and calculation procedures for fan components, including AMCA 207, AMCA 208 and AMCA 210. In order to provide the CEC with a meaningful response, AHRI member companies will need the time to consider and, quite possibly, to conduct testing, in order to establish the applicability and impact of different test and calculation procedures on their equipment.

AHRI is the trade association representing manufacturers of heating, cooling, water heating, and commercial refrigeration equipment. More than 300 members strong, AHRI is an advocate for the industry and develops standards for and certifies the performance of many of the products manufactured by our members. In North America, the annual output of the HVACR and water heating industry is worth more than \$44 billion. In the United States alone, the HVACR and water heating industry supports 1.3 million jobs and \$256 billion in economic activity annually.

Thank you for the review and consideration of AHRI's request for a 60-day extension of the comment period on this draft staff report. If you have any questions regarding this submission, please do not hesitate to contact me.

Sincerely,

Laura Petrillo-Groh, PE

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