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*Comment Received From: Nicholas Harbeck
Submitted On: 7/17/2020
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**AHRI Request for Extension of Comment Period to CEC FSSAT
Comment Deadline**

Additional submitted attachment is included below.

July 17, 2020

Mr. Heriberto Rosales
Dr. Nicholas Janusch
California Energy Commission
Docket Unit, MS-4
Re: Docket No. 19-DECARB-01
1516 Ninth Street
Sacramento, CA 95814-5512

(submitted electronically to Docket 19-DECARB-01)

Re: Request for Extension of Comment Period in Response to Notice of Extension of Public Comment Period for Building Decarbonization: AB 3232 – Fuel Substitution Scenario Analysis Tool Workshop to July 20, 2020 [*Docket Number 19-Decarb-01*]

Dear Messrs. Rosales and Janusch:

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 CEC holds its Building Decarbonization: AB 3232 – Fuel Substitution Scenario Analysis Tool (FSSAT) Workshop 2. CEC has announced in the May 28, 2020, public notice that CEC will host two part-day workshops on the AB 3232 Fuel Substitution Scenario Analysis Tool (June 9, 2020) and preliminary FSSAT results for the assessment (June 26, 2020). Comments were requested for both workshops on July 10, 2020.

On June 9, 2020, CEC held the first workshop on the AB 3232 Fuel Substitution Scenario Analysis Tool (FSSAT), as planned. AHRI and its members participated in Workshop 1. AHRI understood that after the June 9th Workshop, CEC would hold a second workshop on the FSSAT draft scenario on June 26, 2020, as initially announced. CEC did request comments on **both** workshops to be due by July 10, 2020. However, the June 26, 2020 Workshop 2 was postponed on June 19, 2020¹ until further notice. The notice indicated that written comments due for July 10, 2020 was also canceled and its due date was “to be determined” at a later date. From this notice, it was apparent that Workshop 2 and the written comments would be rescheduled with adequate notice for the public to participate.

¹ California Energy Commission, Revised notice of Postponed Workshop- Notice of Building Decarbonization: AB 323 – Fuel Substitution Scenario Analysis Tool Workshop, June 19, 2020.
<https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=19-DECARB-01>. Last accessed July 16, 2020.

AHRI had been waiting for CEC's announcement for the rescheduled Workshop 2 to continue the review of the preliminary FSSAT results. As of the date of this letter, Workshop 2 still has not been rescheduled.

Rather, on July 13, 2020, CEC published a Notice of Extension of Public Comment Period from the canceled July 10, 2020 deadline to July 20, 2020. Essentially, CEC has provided the public only eight (8) days notice, from the July 13th notice, to provide comments on half the information presented on the draft preliminary FSSAT results. The intent of the initial comment deadline is to provide the public time to comment on information presented at **both** workshops.

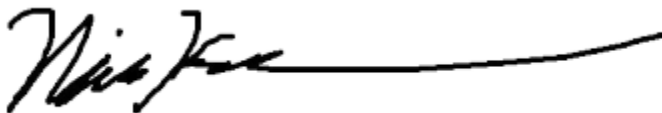
AHRI is shocked that CEC expects to receive thoughtful and substantive comments on such a complex topic that will have a lasting impact to California and the public for years to come. AHRI and its members find it difficult to provide adequate and complete comments to CEC when the FSSAT results have not been fully presented or vetted by the public. Based on the information presented in Workshop 1, the public has received only half of the information from the draft preliminary FSSAT results. Lastly, an 8-day notice for comments is clearly insufficient notice to the public, especially when the July 10, 2020 comment deadline was already canceled.

AHRI requests that CEC schedule the Building Decarbonization: AB 3232 – FSSAT Workshop 2 and extend its comment deadline to thirty (30) days after the conclusion of Workshop 2. In addition, CEC should allow stakeholders to comment on both or either Workshop 1 or Workshop 2 in the new thirty (30) day public comment period.

AHRI represents over 315 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.

Thank you for the review and consideration of AHRI's request for a 30-day extension after the conclusion of the Building Decarbonization: AB 3232 – FSSAT Workshop 2 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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