

**DOCKETED**

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<b>Project Title:</b>	2022 Amendments to the Appliance Efficiency Regulations
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*Comment Received From: Air Conditioning, Heating, and Refrigeration Institute  
Submitted On: 3/22/2024  
Docket Number: 22-AAER-04*

**AHRI Comments in Response to California Energy  
Commission's Proposed 2022 Amendments to the Appliance  
Efficiency Regulations**

*Additional submitted attachment is included below.*



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March 22, 2024

Mr. Peter Strait  
California Energy Commission  
Docket Unit, MS-4  
Re: Docket No. 22-AAER-04  
1516 Ninth Street  
Sacramento, CA 95814-5512

(Submitted electronically to Docket)

Re: AHRI Comments in Response to California Energy Commission's Proposed 2022 Amendments to the Appliance Efficiency Regulations (15-Day Language) [*Docket Number 22-AAER-04*]

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Dear Mr. Strait:

These comments are submitted in response to the California Energy Commission (CEC) Notice of Proposed Action, published on March 8, 2024, with proposed amendments to California's Appliance Efficiency Standards in Title 20 of the California Code of Regulations, Sections 1601 through 1609.

AHRI represents more than 330 manufacturers of air conditioning, heating, and refrigeration equipment. It is an internationally recognized advocate for the HVACR industry and certifies the performance of many of the products manufactured by its members. In North America, the annual economic activity resulting from the HVACR industry is more than \$211 billion. In the United States alone, AHRI member companies, along with distributors, contractors, and technicians employ more than 704,000 people.

We appreciate CEC's consideration and adoption of AHRI's feedback to the 45-day language. AHRI commends CEC for the care it has taken with proposed modification to Title 20 for the many products included in the scope of this rulemaking.

We understand the CEC was unable to wait until the publication of the U.S. Department of Energy (DOE) final rule for Certification Requirements, Labeling Requirements, and Enforcement Provisions for Certain Consumer Products and Commercial Equipment, Docket No. EERE-2020-BT-STD-0007 to finalize Title 20. However, we recommend that CEC review the DOE final rule, when it is available, and publish 15-day language on revisions to Section 1606, if necessary, to ensure harmonization between federal and state reporting. Of the many products DOE sought feedback on, AHRI members manufacture Air Cleaners; Central Air Conditioners and Heat Pumps (CAC/HP); Pool Heaters; Computer Room Air Conditioners (CRAC); Direct

Expansion-Dedicated Outdoor Air Systems (DX-DOAS); Air Cooled; Three-Phase, Small Commercial Air Conditioners and Heat Pumps with a Cooling Capacity of Less Than 65,000 Btu/h (3-ph Small CAC/HP) and Air-Cooled, Three-Phase, Variable Refrigerant Flow Air Conditioners and Heat Pumps with a Cooling Capacity of Less Than 65,000 Btu/h (3-ph Small VRF); Commercial Water Heating Equipment (CWH); Automatic Commercial Ice Makers (ACIM); Walk-In Coolers and Freezers (WICF); and Single Package Vertical Units (SPVU). We look forward to working with CEC to prioritize equipment with earlier compliance deadlines (i.e. CRAC and DX-DOAS in May 2024).

Thank you again for your careful consideration of AHRI's 45-day comments. If you have any questions regarding this submission, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'L. Groh', with a long horizontal flourish extending to the right.

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