

May 3, 2013

California Energy Commission (CEC)
Dockets Office, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

Re: AHRI Comments – Docket No. **12-AAER-2E** (Air Filter Labeling)

Dear CEC Staff:

The Air-Conditioning, Heating and Refrigeration Institute (AHRI) is the trade association representing manufacturers of heating, cooling, water heating, and commercial refrigeration equipment. Over 300 members strong, AHRI is an internationally recognized 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 industry is worth more than \$20 billion. In the United States alone, our members employ approximately 130,000 people, and support some 800,000 dealers, contractors, and technicians.

We are submitting these comments in response to the questions that were raised by CEC staff on air filter labeling at the Invitation to Participate (ITP) meeting on April 9, 2013. We believe that any mandatory requirement to label air filters would be onerous for manufacturers and not offer any additional benefit to the consumer. The proposed requirement would force manufacturers to produce California-specific packaging which would not only increase the cost of manufacturing, but also lead to additional challenges in managing inventory. Air filters are sold across North America, and distribution of these products is generally not split by region. A requirement to provide specific information on the filter for a single state would be cumbersome for manufacturers. Additionally, the process would be rendered inefficient and cause customer confusion if other states adopt a similar approach but specify labeling requirements that are different from those specified by the CEC.

Instead of requiring a label that specifies information in accordance with §150.0(m)12B and §150.0(m)12C of the *2013 Building Energy Efficiency Standards* (California Code of Regulations, Title 24, Parts 1 and 6), CEC should allow the manufacturer to disclose the efficiency and pressure drop ratings on the manufacturer's website. Such an approach will provide a better value to the consumer because the data on the website would be more legible as compared to placing the same information in a smaller font on an air filter due to space limitations. The website approach would meet CEC's disclosure objectives without being unduly burdensome for manufacturers.

Lastly, we were surprised to hear from CEC staff during the April 9, 2013 workshop that the comments docketed during the Title 24 rulemaking process would not be considered during this rulemaking process. Given that the air filter labeling issue is common to both the Title 24 and Title 20 rulemakings, we urge that CEC staff managing the separate rulemakings coordinate their efforts in order to ensure that the regulations are consistent for air filter manufacturers.

AHRI appreciates the opportunity to provide these 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 be 'AR' with a stylized flourish extending from the bottom right.

Aniruddh Roy
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