

Hussmann Corporation  
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October 10, 2014

California Energy Commission  
Dockets Office, MS-4  
Re: Docket No. 12-AAER-1  
1516 Ninth Street  
Sacramento, CA 95814-5512

Re California Energy Commission Enforcement Process Docket No. 12-AAER-1

Energy Commission,

Hussmann Corporation would like to have clarification for Docket No. 12-AAER-1 "Appliance Efficiency Enforcement Rulemaking". Reducing burden, the method of test, and knowledge of a third party test facility are of concern.

Item 1 – How often must the manufacturer update the Appliance Database and will the California Energy Commission (CEC) harmonize a database with the Department of Energy? Hussmann actively participates in uploading our product's (commercial refrigerated display case equipment, CRE) certified energy ratings in the CEC Appliance Database. A harmonized database would reduce burden on manufacturers and lessen confusion with the public, who will be using these databases to gain knowledge about the product.

Item 2 - How does the California Energy Commission (CEC) determine which cases will be tested? Is there a determined verification process established? How will the CEC guarantee tested product is in the factory OEM condition and does not include field retrofits or add-ons?

Item 3 – Where will the CRE product be tested? Hussmann has worked with third party testing agencies and found that these agencies do not have a full understanding of our product and are not able to conduct a test without our assistance. As a manufacturer we understand how to set up and adjust a remote display case so it will operate at the optimum performance. We have found that third party agencies do not understand what to look for (pressures, evaporator and discharge temperatures, air flow, etc.) and have not been able to run basic performance testing without our assistance.

Item 4 – Will the manufacturer be allowed to witness the testing? A failed test is difficult to assess if we have no confidence in the process. Without witness testing we have no way of knowing if the case is operating properly or if the testing group has made the proper adjustments. Witness testing also assures that the test set up is correct (per the ASHRAE standard).

Sincerely,

Ron Shebik  
Regulatory Compliance Manager  
Hussmann Corporation  
314-298-6483

California Energy Commission

**DOCKETED**

**12-AAER-1**

**TN 73827**

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