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July 5, 2016

Ms. Kirsten Hesla  
U.S. Environmental Protection Agency  
([commercialrefrigeration@energystar.gov](mailto:commercialrefrigeration@energystar.gov))

**Re:** AHRI Comments on Draft 2 Version 4.0 Product Specification for ENERGY STAR Qualified Commercial Refrigerators and Freezers

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Dear Ms. Hesla:

These comments are submitted by the Air-Conditioning, Heating, and Refrigeration Institute (AHRI) in response to the Environmental Protection Agency (EPA) request for comments on Draft 2 Version 4.0 Product Specification for ENERGY STAR Qualified Commercial Refrigerators and Freezers, which was issued on June 7, 2016.

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 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.

Regarding the timing of the update to the specification, AHRI understands that EPA is working to have the final specification released in July to include an effective date that coincides with the March 27, 2017, effective date of the update Department of Energy (DOE) minimum efficiency standards. It is understandable that this timely update is necessary for the ENERGY STAR program to remain relevant as the 2017 DOE efficiency standards meet or exceed the Version 3.0 ENERGY STAR levels.

As EPA is aware, the updated 2017 DOE efficiency standards have been challenged in court and are pending a final decision, which we expect shortly. We request that EPA reconsider the specification depending on the court's decision. If the 2017 DOE efficiency standards are vacated, AHRI requests that EPA terminate the updates to the Specification and continue to reference Version 3.0 until alternate efficiency standards are proposed by DOE.

AHRI appreciates the opportunity to provide these comments. If you have any questions regarding this submission or would like to discuss any of these points further, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Helen Davis". The signature is fluid and cursive, with the first name "Helen" and last name "Davis" clearly distinguishable.

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