

April 2, 2012
Via Electronic Mail

Ms. Brenda Edwards
U.S. Department of Energy
Building Technologies Program, Mailstop EE-2J
1000 Independence Ave., SW
Washington, DC 20585-0121

Re: Docket Number EERE-2011-BT-STD-0029; RIN 1904-AC47

Dear Ms. Edwards:

This letter constitutes the comments of the Natural Resources Defense Council and the Appliance Standards Awareness Project in response to the Department of Energy's request for comment in the above-captioned rulemaking regarding Energy Conservation Program for Certain Industrial Equipment: Energy Conservation Standards and Test Procedures for Commercial Heating, Air Conditioning, and Water-Heating Equipment.

The Natural Resources Defense Council (NRDC) is an international nonprofit environmental organization with more than 1.3 million members and online activists. Since 1970, our lawyers, scientists, and other environmental specialists have worked to protect the world's natural resources, public health, and the environment. NRDC's top institutional priorities are curbing global warming and creating a clean energy future. Energy efficiency is the quickest, cleanest, cheapest solutions to global warming and other energy-related problems. Cost-effective energy efficiency standards help to ensure that consumer and commercial products provide the same level of comfort and service using less energy, with benefits for consumers, the environment and the electricity grid. For more than 30 years, NRDC has advocated for stronger federal and state energy efficiency standards for household appliances and commercial products, and for strong implementation and enforcement of these standards.

I. Products excluded from the NOPR

The June 6, 2012 Comments submitted by NRDC and several other efficiency advocates on the Notice of Data Availability (NODA) explain why the Department of Energy is required to consider revising efficiency standards for any product whose standard was established more than six years ago. *See* June 6, 2012 Comments of Appliance Standards Awareness Project, NRDC, Northwest Energy Efficiency Alliance and the Northwest Power Conservation Council. In particular, there are a number of products such as commercial packaged air conditioners and heat pumps whose ASHRAE standards have not been revised and whose DOE standards were set in 2005. Thus, even if there has not been an ASHRAE trigger, the Department must still consider revising the standards for such products pursuant to the six year review requirement. In the NOPR, the Department indicated that it believes the six-year review requirement applies only to

standards set after passage of the six-year review provision in 2007. This interpretation is in error. For the reasons expressed in our June 6, 2012 Comments, the six-year review applies to “any” standard, including those set in 2005, just two years prior to passage of the six-year review provision. Accordingly, the Department must consider updating standards for the ASHRAE products for which there was not a revision if DOE last set standards more than six years ago.

II. Computer Room Air Conditioners

The Department should carefully evaluate whether greater cost-effective savings could be achieved from the ASHRAE standard for computer room air conditioners. Based on the comments submitted by the Northwest Energy Efficiency Alliance, it appears that the ASHRAE level for air-cooled computer room air conditions may be lower than the standard set by the California Energy Commission. The Department must carefully review the standards for computer room air conditioners and confirm whether the adoption of a more stringent standard would be technologically feasible and economically justified and save a significant amount of additional energy.

In particular, NRDC urges DOE to evaluate raising the efficiency standards for air-cooled computer room air conditions between 65,000 Btu/hr and 240,000 Btu/hr and those above 240,000 Btu/hr. In both instances, DOE’s analysis suggests that higher efficiency levels would be cost-effective and would save a significant amount of additional energy. 77 Fed. Reg. 3576, 2408-09, 2412 (Jan. 17, 2012). In the case of units between 65,000 and 240,000 Btu/hr, level three is cost-effective and would save 0.20 quads. For units over 240,000 Btu/hour, level four is cost-effective and would save 0.21 quads.

Sincerely,



Benjamin Longstreth
Senior Attorney
Natural Resources Defense Council



Joanna Mauer
Technical Advocacy Coordinator
Appliance Standards Awareness Project