

**Appliance Standards Awareness Project
Alliance to Save Energy
American Council for an Energy-Efficient Economy
California Energy Commission
Consumer Federation of America
National Consumer Law Center
Natural Resources Defense Council
Northeast Energy Efficiency Partnerships
Northwest Energy Efficiency Alliance
Pacific Gas and Electric**

May 10, 2019

Ms. Jennifer Tiedeman
U.S. Department of Energy
Office of the General Counsel, GC-33
1000 Independence Ave.
Washington DC 20585-0121

RE: Public Meeting request for docket EERE-2019-BT-NOA-0011

Dear Ms. Tiedeman:

We are writing to request that DOE hold a public meeting concerning the proposed rule related to test procedure waivers published in the Federal Register on May 1. (84 Fed Reg 18414) This proposed rule has the potential to have far-reaching consequences for the national appliance standards program. By providing for automatic test procedure waivers if DOE does not provide disposition to an application within 30 days of receipt, the proposal potentially affects all products subject to standards and every regulated manufacturer. We are concerned that both the current waiver process and associated enforcement policy and the proposed changes to it are not well understood. A public meeting is necessary for us and other stakeholders to provide informed feedback.

In addition, a significant portion of the Federal Register notice is dedicated to a cost savings analysis under Executive Orders 13771 and 13777. Since this analysis appears to be a major consideration driving this proposed rule and the Department has not previously conducted this type of analysis, we request that DOE explain it in the public meeting.

DOE appears to have recognized the importance of this rule since it underwent review by the Office of Management and Budget. If a rule merits OMB review, it likely merits a public meeting.

We look forward to engaging with DOE and other stakeholders on this important topic. Thank you for considering this request.

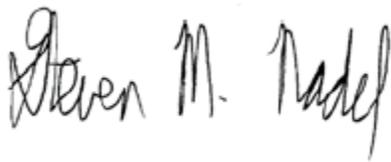
Best regards,



Andrew deLaski
Executive Director
Appliance Standards Awareness Project



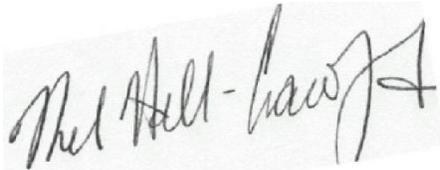
Dan Bresette
Vice President, Policy
Alliance to Save Energy



Steve Nadel
Executive Director
American Council for an Energy-Efficient
Economy



David Hochschild
Chair
California Energy Commission



Mel Hall-Crawford
Director, Energy Programs
Consumer Federation of America



Charlie Harak, Esq.
National Consumer Law Center
(on behalf of its low-income clients)



Lauren Urbanek
Senior Energy Policy Advocate
Natural Resources Defense Council



Claire Miziolek
Technology & Market Solutions Senior Manager
Northeast Energy Efficiency Partnerships

//s//ad

Bing Liu
Sr. Manager, Energy Codes and Standards
Northwest Energy Efficiency Alliance

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

Pat Eilert
Manager, Codes & Standards
Pacific Gas and Electric

Cc: Sophie Miller; Dan Cohen; John Cymbalsky; Laura Barhydt