

Appliance Standards Awareness Project  
American Council for an Energy-Efficient Economy  
Northwest Energy Efficiency Alliance

May 2, 2022

Ms. Catherine Rivest  
U.S. Department of Energy  
Office of Energy Efficiency and Renewable Energy  
Building Technologies Office, EE-5B  
1000 Independence Avenue SW, Washington, DC 20585

**RE: Docket Number EERE-2018-BT-STD-0003: Proposed Rule for Energy Conservation Standards for Variable Refrigerant Flow Multi-Split Air Conditioners and Heat Pumps**

Dear Ms. Rivest:

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP), the American Council for an Energy-Efficient Economy (ACEEE), and the Northwest Energy Efficiency Alliance (NEEA) on the notice of proposed rulemaking for energy conservation standards for variable refrigerant flow (VRF) multi-split air conditioners and heat pumps. 87 FR 11335 (March 1, 2022). We appreciate the opportunity to provide input to the Department.

We support the proposed standards and the compliance date of January 1, 2024 for all VRF multi-split equipment classes, which reflect the recommendations of the VRF ASRAC Working Group. We also support the proposed amendments to the equipment class structure, which would bring the DOE equipment classes into alignment with ASHRAE 90.1.

Thank you for considering these comments.

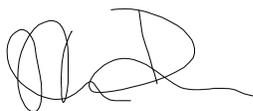
Sincerely,



Rachel Margolis  
Technical Advocacy Associate  
Appliance Standards Awareness Project



Amber Wood  
Director, Buildings Program  
American Council for an Energy-Efficient Economy



Nicole Dunbar  
Product Manager  
Northwest Energy Efficiency Alliance