

Appliance Standards Awareness Project
Alliance to Save Energy
Consumer Federation of America
Natural Resources Defense Council
Northwest Energy Efficiency Alliance

August 26, 2013

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

**RE: Docket Number EERE–BT–PET–0038/ RIN 1904–AD05: Petition for
Rulemaking to Collect Energy Efficiency Ratio (EER) Information**

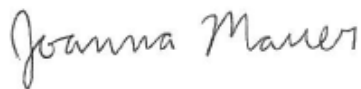
Dear Ms. Edwards:

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP), Alliance to Save Energy (ASE), Consumer Federation of America (CFA), Natural Resources Defense Council (NRDC), and Northwest Energy Efficiency Alliance (NEEA) on the First Co. petition for rulemaking to collect energy efficiency ratio (EER) information. 78 Fed. Reg. 44895 (July 25, 2013). We appreciate the opportunity to provide input to the Department.

We support First Co.'s petition requesting that DOE amend the certification regulations for central air conditioners and heat pumps to collect energy efficiency ratio (EER) information and publish the information in DOE's Compliance Certification Database (CCD). The direct final rule for central air conditioners and heat pumps published in 2011 includes EER standards for central air conditioners installed in the Southwestern region. Certification of EER values by manufacturers is critical in order for DOE to ensure compliance with the EER standards and conduct enforcement. In addition, publishing EER values in the CCD, as is currently done for SEER and HSPF, would provide valuable information to consumers, contractors, and others to both help ensure compliance with the EER standards and to inform purchasing decisions.

Thank you for considering these comments.

Sincerely,



Joanna Mauer
Technical Advocacy Coordinator
Appliance Standards Awareness Project



Rodney Sobin
Director of Research and Regulatory Affairs
Alliance to Save Energy



Mel Hall-Crawford
Energy Projects Director
Consumer Federation of America



Meg Waltner
Manager, Building Energy Policy
Natural Resources Defense Council



Charlie Stephens
Sr. Energy Codes & Standards Engineer
Northwest Energy Efficiency Alliance