

**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.

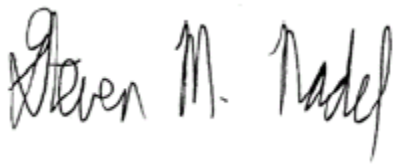
Best regards,



Andrew deLaski  
Executive Director  
Appliance Standards Awareness Project



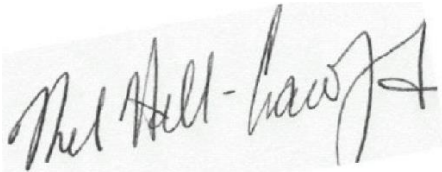
Dan Bresette  
Vice President, Policy  
Alliance to Save Energy



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