Consumer Federation of America

June 6, 2022

Mr. Bryan Berringer
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–2014–BT–STD–0059/RIN 1904–AD97: Notice of Proposed Rulemaking for Energy Conservation Standards for Room Air Conditioners

Dear Mr. Berringer:

Consumer Federation of America (CFA), and the National Consumer Law Center (NCLC) are writing in response to the Department's Notice of Proposed Rulemaking regarding room air conditioners (ACs). 87 Fed. Reg. 20608 (April 7, 2022). We wish to highlight consumer support for greater efficiency for room ACs, which will save billions of dollars in energy bills and eliminate millions of tons of climate-harming emissions.

In the NOPR, DOE proposed strong efficiency standards for room ACs which the Department estimates would save consumers $4.8 to $10.6 billion.[1] Prompt finalization of the standards will ensure that all consumers benefit from up-to-date, energy-saving technology. Low-income consumers, in particular will benefit as on average they have to pay a disproportionately higher percentage of their incomes on energy bills compared to other households and a majority of them are renters. Tenants, when moving into housing, often find only room ACs or in many cases, must furnish their own AC.

The importance of efficient room ACs will only continue to grow, with air conditioning becoming increasingly necessary for consumers across the United States due to extreme summer temperatures caused by climate change. Vulnerable populations such as seniors, children and infants, and medically vulnerable persons with chronic conditions – are more likely to have lower income and lack a central air conditioner – should not be hampered from accessing efficient room ACs that will continue to save them money over the lifetime of the unit.

We support DOE's proposed standards for room ACs ≥8,000 Btu/h, which would transition the market for larger units to high-efficiency variable-speed technology. For the most common units in this capacity range, which are room ACs without reverse cycle and with

[1] 87 Fed. Reg. 20611.

louvered sides between 8,000 and 13,999 Btu/h (product class 3), DOE estimates average consumer saving over the unit's lifetime of about $100, with a payback period of less than three years.[2]

For room ACs <8,000 Btu/h, which are large enough to cool most rooms, and would meet the needs of many low-income households, DOE estimates average life-cycle cost savings for consumers of about $65 and $80, respectively, with payback periods of less than one year. However, we encourage DOE to evaluate and consider adopting levels equivalent to the proposed standards plus the addition of an ECM fan motor. For a more detailed rationale, we refer you to the comments submitted by the Appliance Standards Awareness Project, et al. to which we are also signatories.

In closing, we urge the Department to promptly finalize standards for room ACs. Consumers, and particularly low-income consumers, should no longer be subject to higher electric bills because out-of-date, less efficient technologies continue to be made available in the marketplace.

Thank you for your consideration of our views.

Richard Eckman
Energy Policy Associate
Consumer Federation of America
reckman@consumerfed.org

Charlie Harak
Staff Attorney
National Consumer Law Center, on behalf of its low income clients
charak@nclc.org

[2] 87 Fed. Reg. 20611. Table I.2.