



Shaping Tomorrow's Global Built Environment Today

180 Technology Parkway, Peachtree Corners, GA 30092 ▪ Tel 404.636.8400 ▪ www.ashrae.org

M. Dennis Knight
2024-2025 ASHRAE President
Mt. Pleasant, SC 29464

Whole Building Systems, LLC
921 Pitt St.

Phone: (843) 437-3647
Email: dknight@wholebuildingsystems.com

May 30, 2025

Mr. Lucas Adin
Office of Energy Efficiency and Renewable Energy
Building Technologies Office
U.S. Department of Energy
1000 Independence Avenue Southwest
Washington, D.C. 20585

Re: Appliance and Equipment Standards Program: Process Rule

Sent via email to: ProcessRule2025STD0001@ee.doe.gov

Dear Mr. Adin:

Thank you for the opportunity to provide input on the April 17, 2025 Request for Information (RFI) issued by the U.S. Department of Energy (DOE) entitled “Energy Conservation Program: Procedures, Interpretations, and Policies for Consideration of New or Revised Energy Conservation Standards and Test Procedures for Consumer Products and Certain Commercial/Industrial Equipment” (the “Process Rule”). ASHRAE is providing comments focusing on the Energy Policy and Conservation Act (EPCA) process for ASHRAE equipment.

ASHRAE, founded in 1894, is a professional and technical society of more than 54,000 members who focus on building systems, energy efficiency, indoor air quality, refrigeration and resiliency within the built environment. Through research, standards development, publishing, certification and continuing education, ASHRAE shapes tomorrow’s global built environment today. ASHRAE is actively engaged in the development of robust, voluntary, consensus-based standards for the built environment that focus on heating, ventilating, air-conditioning, and refrigeration. ASHRAE is one of only seven standards-developing organizations in the U.S. that can self-certify that its standards have followed procedures established by the American National Standards Institute (ANSI). ASHRAE’s voluntary consensus standards are developed through the participation of any and all interested and affected stakeholders; importantly these participants do not need to be ASHRAE members. ASHRAE is proud of its consensus-based standards setting process, which is transparent, balanced, robust, and accredited by ANSI.

In February 2020 during the first Trump administration, ASHRAE appreciated that DOE included in its final rulemaking a clarification of the process rule with respect to its application to equipment covered by ASHRAE Standard 90.1, *Energy Standard for Buildings Except Low-Rise Residential Buildings*. In that 2020 rulemaking, DOE stated, “For ASHRAE equipment, DOE will adopt the revised ASHRAE levels or the industry test procedure, as contemplated by EPCA, except in very limited circumstances.” ASHRAE appreciates this clear reference to the statute and clarifying of the limited circumstances under which DOE would deviate from the revised ASHRAE level or test procedure. This rule also made the process rule binding on DOE, which ASHRAE supports.

In a subsequent 2021 rulemaking, ASHRAE appreciated that DOE made clear the triggering event for covered equipment is ASHRAE’s publication of an updated version of ASHRAE Standard 90.1, not when an addendum to ASHRAE Standard 90.1 is released or approved. This provides for a regular three-year cadence of reviews and clarity. Additionally, the 2021 rule reiterated that “DOE will adopt the revised ASHRAE levels or industry test procedure, except in very limited circumstances.” ASHRAE supports keeping this statement, as removing it could allow a deviation from ASHRAE levels and makes rulemakings more onerous and expensive for DOE. This could also increase uncertainty by deviating from the ASHRAE consensus decision and potentially cause market and consumer confusion. However, DOE removed language in the 2021 rulemaking that made the process rule non-binding on DOE. ASHRAE objects to this provision from the 2021 rule, as without a binding process, the public, industry, and other concerned stakeholders experience uncertainty and confusion as to how DOE is moving forward with rulemaking or priority setting.

As DOE works to revise Process Rule, **ASHRAE urges DOE to continue to defer to ASHRAE Standard 90.1, *Energy Standard for Buildings Except Low-Rise Residential Buildings*** in promulgating energy efficiency standards for relevant ASHRAE equipment. We also caution DOE against increasing the efficiency beyond Standard 90.1 and urge DOE to strictly adhere to the so-called “7 Factor Test” if considering such a modification. This approach will enable DOE to meet its deadlines and statutory obligations. More importantly, faster adoption by DOE of the amended equipment energy efficiency standards in ASHRAE Standard 90.1 will help realize the energy conservation benefits of the updated 90.1, which will lead to lower energy costs for consumers and businesses and reduced load on the electric grid. This approach is also in line with the National Technology Transfer and Advancement Act, which directs federal agencies to adopt voluntary industry consensus standards unless inconsistent with the law or impracticable. The Office of Management and Budget (OMB) Circular A-119 also directs the federal government to participate in the development and use of voluntary consensus standards and in conformity assessment activities by leveraging the expertise of non-governmental entities.

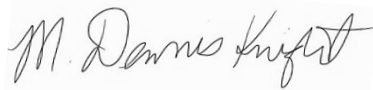
As mentioned above, EPCA requires DOE to consider updating federal energy conservation standards when 90.1 makes an update that increases the stringency or adds requirements for ASHRAE covered equipment. ASHRAE believes the trigger should be when the full version of Standard 90.1 is updated and published.

With respect to the definition of “significant energy savings,” there is no widely agreed upon definition for “significant energy savings” because it will vary by product and application. Instead, the focus

should be on achieving efficiency improvements on an individual basis, and within the technologically and economically feasible limits of each product. For that reason, it is important for DOE and ASHRAE to continue their collaborative approach. Setting performance requirements for ASHRAE equipment requires a level of deliberation and stakeholder engagement that happens through the ASHRAE Standard 90.1 process and cannot be substituted with a single metric. Maintaining deference to ASHRAE Standard 90.1 efficiency standards for ASHRAE equipment will ensure that decisions are made with an industry-backed analysis that accounts for the complexity of assessing different types of equipment.

In closing, we appreciate your consideration of ASHRAE's input and look forward to continued engagement on this RFI and subsequent rulemaking. We welcome any follow-up questions about ASHRAE's standards development process, ASHRAE Standard 90.1, or other technical matters. If you would like any clarification on the submitted response or have any other questions, please contact GovAffairs@ashrae.org.

Sincerely,

A handwritten signature in black ink, reading "M. Dennis Knight". The signature is written in a cursive, flowing style. The letters are dark and the ink appears to be on a light-colored surface.

Sincerely,

M. Dennis Knight, P.E.

ASHRAE Society President, 2024-2025