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January 3, 2018

By E-mail

Mr. Chad Whiteman
Office of Information and Regulatory Affairs
Office of Management and Budget
725 17th Street NW
Washington, DC 20503

Ms. Ashley Armstrong
U.S. Department of Energy
Office of Energy Efficiency and Renewable Energy
Building Technologies Office
1000 Independence Avenue, SW
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oir_submission@omb.eop.gov

Re: Joint Comments on DOE's Agency Information Collection Extension, With Changes;
Docket No. EERE-2017-BT-CRT-0054

Dear Mr. Whiteman and Ms. Armstrong:

The Air-Conditioning, Heating, and Refrigeration Institute (AHRI), American Lighting Association (ALA), Association of Home Appliance Manufacturers (AHAM), Hearth, Patio & Barbecue Association (HPBA), the Information Technology Industry Council (ITI), and National Electrical Manufacturers Association (NEMA) (collectively, the Joint Commenters) respectfully submit the following comments to the Department of Energy (DOE) and Office of Information

and Regulatory Affairs (OIRA) on DOE's Agency Information Collection Extension, With Changes; Docket No. EERE-2017-BT-CRT-0054; 82 Fed. Reg. 57240 (Dec. 4, 2017).

The Joint Commenters support DOE in its efforts to ensure a national marketplace through the Appliance Standards Program, which reduces manufacturing and consumer costs. Our members' innovations over the last few decades have provided tremendous energy savings for consumers. We agree with DOE that by eliminating duplicative reporting, DOE can minimize burden on manufacturers, without reducing benefits for consumers or usefulness for the DOE.

DOE seeks to renew its information collection related to gathering data and submitting certification and compliance reports for each basic model distributed in commerce in the U.S. including supplemental testing instructions for certain commercial equipment. We appreciate DOE making changes to its information collection request based on our comments to acknowledge the data the Joint Commenters submitted regarding the time and cost to comply with DOE's annual reporting requirement.

The Joint Commenters strongly support elimination of duplicative reporting requirements. Thus, we support DOE's incorporation of the cost of reporting additional fields into its certification templates that would aid in facilitating a reduction in duplicative reporting under the California's Appliance Efficiency Regulations and the ENERGY STAR program. We appreciate DOE's commitment to work with the California Energy Commission (CEC) and the Environmental Protection Agency (EPA) on ways to reduce duplicative reporting on a case-by-case basis.

We continue to be interested in further reducing regulatory burden by working with the Department to reevaluate the annual certification reporting requirement which results in unnecessary paperwork costs for no reason. We thank DOE for agreeing to take our October 23, 2017 comments on this docket into consideration when DOE evaluates changes to its rules.

The Joint Commenters

AHRI is the trade association representing over 315 manufacturers of residential, commercial, and industrial air conditioning, space heating, water heating, and commercial refrigeration equipment and components for sale in North America and around the world. The heating, ventilation, air-conditioning, refrigeration (HVACR), and water heating industry employs 1.3 million people and generates \$257 billion in economic activity annually.

ALA is a trade association representing over 3,000 members in the residential lighting, ceiling fan and controls industries in the United States, Canada and the Caribbean. Our member companies are manufacturers, manufacturers' representatives, retail showrooms and lighting designers who have the expertise to educate and serve their customers.

AHAM represents manufacturers of major, portable and floor care home appliances, and suppliers to the industry. AHAM's more than 150 members employ tens of thousands of people in the U.S. and produce more than 95% of the household appliances shipped for sale within the U.S. The factory shipment value of these products is more than \$30 billion annually. The home appliance industry, through its products and innovation, is essential to U.S. consumer lifestyle,

health, safety and convenience. Through its technology, employees and productivity, the industry contributes significantly to U.S. jobs and economic security. Home appliances also are a success story in terms of energy efficiency and environmental protection. New appliances often represent the most effective choice a consumer can make to reduce home energy use and costs.

Based in Arlington, VA, HPBA is the principal trade association representing the hearth products and barbecue industries in North America. HPBA's members include manufacturers, retailers, distributors, manufacturers' representatives, service installation firms, and other companies and individuals who have business interests related to the hearth, patio, and barbecue industries. HPBA's core purpose is to promote the welfare of the industries it serves, and one of its critical roles is to serve as an advocate representing the interests of these industries and of its individual members in matters involving the development or implementation of laws or regulations that affect them.

ITI is the global voice of the tech sector. We advocate for public policies that advance innovation, open markets, and enable the transformational economic, societal, and commercial opportunities that our companies are creating. Our members represent the entire spectrum of technology: from internet companies, to hardware and networking equipment manufacturers, to software developers. ITI's diverse membership and expert staff provide a broad perspective and intelligent insight in confronting the implications and opportunities of policy activities around the world.

NEMA represents 350 electrical equipment and medical imaging manufacturers at the forefront of electrical safety, reliability, resilience, efficiency, and energy security. Our combined industries account for more than 400,000 American jobs and more than 7,000 facilities across the United States. Domestic production exceeds \$114 billion per year and exports top \$50 billion.

Respectfully Submitted,

(Signatures on next page)



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