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Submitted to Federal eRulemaking Portal – www.regulations.gov
DOCKET: EERE-2017-BT-TP-0008

Dr. Stephanie Johnson
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Ms. Peter Cochran
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Re: NAFEM Comments – Energy Conservation Program: Test Procedure for Commercial Refrigerators, Refrigerator-Freezers, and Freezers; Dkt. EERE–2017–BT–TP–0008 (87 Fed. Reg. 39,164; June 30, 2022)

Dear Dr. Johnson and Mr. Cochran:

The North American Association of Food Equipment Manufacturers (NAFEM) submits the following comments on the Department of Energy’s (DOE) Energy Conservation Program: Test Procedure for Commercial Refrigerators, Refrigerator-Freezers, and Freezers; Dkt. EERE–2017–BT–TP–0008 (87 Fed. Reg. 39,164; June 30, 2022).

NAFEM is a trade association of more than 500 commercial foodservice equipment and supplies manufacturers – a \$14.9 billion industry. These businesses, their employees, and the products they manufacture, support the food away from home market – which includes more than one million locations in the U.S. and countless more around the world. NAFEM supports, and its members actively seek, opportunities to engage with DOE in the regulatory process to assure certainty and clarity to its regulated members that manufacture equipment relied upon by our society to safely provide food away from home.

NAFEM members include manufacturers of Commercial Refrigerators, Refrigerator-Freezers, and Freezers (CRE) that are the subject of this proposed rule. NAFEM regularly participates with DOE in energy conservation standards rulemakings, including for the CRE product categories.

NAFEM coordinates as much as possible with other trade associations, whose members overlap with NAFEM’s and that represent companies that also manufacture products that are subject to DOE’s CRE rulemakings. In this instance, NAFEM worked very closely with the American Heating and Refrigeration Institute (AHRI) on DOE’s CRE Test Procedure proposed

rulemaking. NAFEM has reviewed AHRI's comments on the CRE Test Procedure proposed rulemaking and, hereby endorses and reiterates the comments submitted by AHRI in this docket.

In addition, NAFEM reiterates its concern with the pace at which DOE is proposing various rulemakings related to products that are produced by NAFEM's members. In fact, there are three significant comment deadlines that expire today. NAFEM has requested a comment extension for one of them and was denied, and yet continues to identify issues and concerns with these proposed rules. While NAFEM has no further comments at this time, it reserves the right to submit further information in the future and hopes that it can work closely with DOE to ensure that the final CRE Test Procedure is appropriate.

NAFEM looks forward to continuing to engage with DOE. Please contact the undersigned if NAFEM can provide any additional insight or assistance regarding the comments of this letter.

Respectfully submitted,

A handwritten signature in black ink that reads "Charlie Souhrada". The signature is written in a cursive, flowing style.

Charlie Souhrada, CFSP
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