

October 4, 2016

MEMORANDUM OF EX PARTE COMMUNICATION

Docket Number: EERE-2013-BT-TP-0025; RIN 1904-AC99

Meeting Date: September 29, 2016

Attendees: Scott Blake Harris and John Hodges (Harris, Wiltshire & Grannis LLP), on behalf of AHT Cooling Systems GmbH and AHT Cooling Systems USA Inc. (collectively AHT); Daniel Cohen and Johanna H. Jochum (Office of the General Counsel, United States Department of Energy).

Meeting Summary:

On behalf of AHT we explained that certain AHT commercial freezers and refrigerators are not designed in a way that is typical in the United States market and, thus, the test procedures set forth in the above-captioned docket do not accurately measure their energy usage. Specifically, AHT's freezers and refrigerators are atypical in three ways: (1) they use propane as a coolant; (2) their evaporator coils are built into the body of the units and do not need to be defrosted; and (3) they are multimode and can operate, simply by turning a switch, as an ice cream freezer, as a commercial freezer, or as a commercial refrigerator.

We pointed out that the testing procedures at issue understandably assumed that it was necessary for commercial freezers to regularly run a defrosting cycle, and that commercial freezers and refrigerators could not be operated in multiple modes. We argued that since those assumptions were incorrect for certain AHT products, the test procedures cannot accurately reflect their energy use and, thus, a different test procedure or some kind of waiver or clarification is needed.

Submitted By:



Scott Blake Harris
Chairman
Harris, Wiltshire & Grannis LLP