



November 16, 2021

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Via email: [reuben.fernandes@csagroup.org](mailto:reuben.fernandes@csagroup.org)

**Re: Comments in Response to the Accreditation of EXP07:22 – Load-based, Climate-specific Testing & Rating Procedure for Heat Pumps and Air Conditioners.**

Dear Mr. Fernandes and CSA Strategic Steering Committee on Performance, Energy Efficiency and Renewables (SCOPEER) Members,

We are writing to you on behalf of the Heating, Refrigeration, and Air Conditioning Institute (HRAI) of Canada and the Air-Conditioning, Heating, and Refrigeration Institute (AHRI) (collectively known as “The Joint Commenters”).

Following extensive discussions with manufacturers of central air conditioners and heat pumps (CAC/HP), HRAI and AHRI respectfully submit this letter in response to the Project Proposal Form (PPF) regarding EXP07:22 currently before SCOPEER.

We continue to support the development and improvement of test procedures to validate energy efficiency performance of HVACR and water heating equipment. Significant industry member and association time and financial investment is currently devoted to this effort. Despite these efforts, EXP07:19 is not ripe to use as a seed document for an accredited standard, and we request that the process to develop the accredited standard be paused temporarily.

We understand that the committee has been meeting regularly to work through the comments and that extensive revisions have been made to the 2019 edition. We know that the 2019 edition is not the right seed document but the current revision under consideration needs to be evaluated to assess how comments have been addressed before we can recommend its use as a seed document. The Joint Commenters have not been contacted by the EXP07 Express Committee regarding resolutions of issues outlined in the extensive comments submitted.<sup>1</sup>

We appreciate and understand the rationale for introducing load-based testing. It is an appealing concept and one that reflects the current pressures industry is under with respect to current global climate change discussions, decarbonization and electrification initiatives, and the growing demand for more energy efficient products, particularly heat pumps that will function reliably in cold

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<sup>1</sup> On December 15, 2020, AHRI submitted comments (attached here) in response to the public technical review draft of CSA EXP07:19 *Load-based and climate-specific testing and rating procedures for heat pumps and air conditioners* (CSA EXP07:19), published March 2019.

climate conditions in Canada. There are currently several efforts underway to evaluate these test methodologies, including the IEA 4E activity, AHRI Unitary Alternate Ratings Working Group, ISO/TC 86/SC 6/TG 13 next generation of performance standards, and ASHRAE TC 8.11 Unitary Next Generation Test Procedure subcommittee, and our members are actively participating in all of these.

Industry members have specific concerns regarding EXP07:22 and the timeframe under which proponents intend to make it a national standard. The concerns are as follows:

1. The repeatability, reliability, and reproducibility of the test procedure;
2. The selection of EXP07 as a seed document prior to the evaluation of other alternative test methodologies to address the concern of representativeness; and
3. The fact that EXP07 currently does not address non-tested combinations or coil-only combinations, which would severely limit customer choice options that currently exist under AHRI 210/240. Until a load-based test procedure considers these combinations, it cannot be considered a replacement for AHRI 210/240.

Industry is therefore requesting a temporary pause on the accreditation process.

Given the concerns industry has expressed regarding the technical efficacy of EXP07:22, we believe more time is needed for input and comment and to evaluate the representativeness, reproducibility, and repeatability of the updates to the procedure that are forthcoming.

We also believe that, given the fact that EXP07:22 is not the only load-based testing procedure currently under review, more time is needed to study and comment on these emerging test procedures. This is necessary to not only determine which procedure might work best for industry and consumers, but to determine how EXP07:22 measures up against other competing test procedures.

We would be happy to present these concerns to the committee in more detail if there is an opportunity to do so. HRAI and AHRI greatly appreciate the members of SCOPEER taking the time to consider this letter on behalf of industry.

We look forward to hearing back from you.

Sincerely,

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