

Rachel Schmelz
Office of Air and Radiation
US EPA
Washington, DC 20460
Schmeltz.rachel@epa.gov

July 22, 2005

Dear Ms. Schmelz,

Thank you for providing an opportunity to comment on the final draft of the ENERGY STAR Central AC/Heat Pump specification revision. The Long Island Power Authority's Cool Homes program currently provides both consumer and contractor incentives for the installation of ENERGY STAR qualified central AC and heat pump equipment. Over the last few years we have increased our program focus on installation quality and are planning significant changes to our program requirements in this regard for 2006.

LIPA Cool Homes endorses and supports the final draft, as far as it goes. We are particularly pleased that the minimum energy-efficiency requirement for split systems has been adjusted to 12 EER. Our main concern is the continued lack of a quality installation component to the specification. We appreciate the difficulty involved in developing a consensus installation component under ENERGY STAR. However, the cost-effectiveness of our program, not to mention our credibility with the residential HVAC industry on Long Island, is dependent upon our ability to effectively address this issue.

We understand that EPA is planning to introduce a quality installation component to the central AC and heat equipment spec by January 1, 2007. We hope that you will be able to meet this schedule. The majority of the systems that we will rebate this year will already be SEER 14, and we believe that systems installed on Long Island without Cool Homes tend to average around SEER11. Next year, when non-participants install SEER 13 under the new national standard, the main things that will differentiate the Cool Homes participant from the rest of the market will be Cool Homes' installation quality components. ENERGY STAR's adherence to a strong quality installation component is important for continued implementation of the Cool Home's program.

Sincerely,

Maggie Ramos
Program Manager
Long Island Power Authority
Cool Homes program