

Comments Via E-mail From Steven Rosenstock, Edison Electric Institute

I recently received a copy of the proposed specifications for Energy Star qualified homes. The following are comments of the Edison Electric Institute, the trade association for investor-owned electric companies:

-The SEER levels for air conditioners and heat pumps in mixed and cold climates should be the same. If 13 SEER is viable (in terms of energy and economic savings) for central air conditioners, then 13 SEER is viable for heat pumps.

-Based on recent information from EPA, Energy Star heat pumps will have an 8.2 HSPF rating. Therefore, the builder option package for mixed and cold climates should have a qualification of 8.2 HSPF for "Energy Star Qualified" heat pumps, not 8.5 HSPF.

-In hot climates, the heating equipment minimum efficiency levels are lower than for mixed and cold climates for fossil-fueled furnaces and boilers, but the same for heat pumps. This does not make sense. If minimum efficiency standards are lower for gas and oil heating equipment, they should also be lower for electric heating equipment.

EI suggests an HSPF rating of 7.9 for heat pumps located in hot climate zones (which are still more efficient than the 7.7 HSPF standard that will be mandatory in January 2006).

-Options should be as market and as fuel neutral as possible, and creating options that are more expensive for electric heating equipment will shift markets towards gas and oil equipment at a time of record gas and oil prices.

Thank you for your review of our comments.