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Mr. Jonathan Passe  
U.S. Environmental Protection Agency  
Office of Air and Radiation  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

Re: Energy Star Proposals for Energy Star Qualified Homes

These are the comments of Southern Company on the “National Builder Option Package” from the July 27, 2005 draft.

Southern Company (Southern) is the parent firm of five electric utilities in the southeastern United States: Alabama Power, Georgia Power, Gulf Power, Mississippi Power, and Savannah Electric. These electric utilities serve over 3.7 million customers, including 3.2 million residential and 479,000 commercial customers. Our 120,000 square mile service territory includes most of Georgia and Alabama, southeastern Mississippi, and the panhandle region of Florida.

Southern Company is an active participant in the Energy Star™ program, and appreciates the opportunity to comment on this proposal.

Overall, the proposal appears reasonable, with the exception of the required HSPF value for heat pumps. The proposed minimum HSPF of 8.5 for all climate zones is higher than the proposed Energy Star™ heat pump efficiency of 8.2, found in the “Final Draft” requirements currently under consideration by the Energy Star™ program.

Regardless of the climate zone, there would appear to be no good reason to require a heat pump to be more efficient to qualify for the Energy Star™ Home program than to qualify for its own Energy Star™ equipment program. As shown on the “National Builder Option Package” chart, an 80 AFUE gas furnace is allowed in Energy Star™ homes in hot climates, even though this is well below the Energy Star™ level for gas furnaces. A more comparable heat pump efficiency for hot climates would be an HSPF of 7.9. A reasonable cold climate heat pump efficiency would be 8.2, the same as the new Energy Star™ heat pump minimum.

Thank you for the opportunity to comment on these Energy Star™ proposals.

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