

Responses to Comments on ENERGY STAR® Most Efficient 2013 Proposed Recognition Criteria

HVAC	
Stakeholder Comments Summary	U.S. Environmental Protection Agency (EPA) Response
One stakeholder expressed support for the continuation of the 95 AFUE criteria for gas boilers, given the fact that there is still relatively low model availability at this level. The stakeholder commented that based on its analysis of the 2012 Most Efficient criteria it calculated that 150 models would be recognized at the proposed levels but that EPA noted that at this point only 71 of these products have been recognized as Most Efficient in 2012. The stakeholder encouraged EPA to do further manufacturer outreach to expedite the recognition of these additional eligible models if it has not already done so.	EPA continues to encourage manufacturers to certify all products, such that they can be recognized as ENERGY STAR Most Efficient in 2013.
One stakeholder expressed continued support for the 97 AFUE criteria for non-weatherized gas furnaces since these products still only account for 1.2 percent of the models on the market.	Comment noted.
One stakeholder encouraged EPA to increase the EER requirement for all types of air conditioners to an EER of 13 or higher and to consider a single air conditioning criterion for future Most Efficient revisions. The stakeholder recommended that EPA increase the EER requirement for air conditioners and heat pumps (including ductless) to an EER 13 or greater to align the criteria with the highest Consortium for Energy Efficiency (CEE) tier, which would aid program design and differentiate models already available on the market at this higher EER level. Additionally, the CEE criteria have not been updated in almost four years, indicating that if anything, EPA should consider going beyond these criteria for the Most Efficient program.	A 13.0 EER requirement would eliminate for recognition many smaller heat pumps and air conditioners, including a number of ductless systems. Thus, EPA will keep the EER requirement at 12.5. This suggestion, and that to have the same EER, SEER and HSPF requirements for ducted and ductless systems, will be reconsidered for 2014. EPA anticipates that system status and communications requirements will remain different for the two types of systems.
One stakeholder expressed strong support for the explicit inclusion of ductless air conditioners and heat pumps in the Most Efficient 2013 program. As noted in the stakeholder's previous comments on the Most Efficient 2012 proposed criteria, ductless mini- and multi-split systems can achieve efficiencies much higher than standard air conditioners. However, the stakeholder disagrees that these products should be held to a different standard than other air conditioning systems, which could be potentially misleading to a consumer looking to buy the most efficient air conditioning system possible. The stakeholder urges EPA to align the SEER, EER and HSPF requirements for ductless systems with those for ducted split systems. The stakeholder states that EPA should eventually move towards a single criterion for air conditioners noting that it is OK for packaged systems to be held to a comparatively higher level of efficiency, similar to the way that larger refrigerators must meet more stringent criteria.	The suggestion to have the same EER, SEER and HSPF requirements for ducted and ductless systems will be reconsidered for 2014. EPA anticipates that system status and communications requirements will remain different for the two types of systems.
Two stakeholders expressed support for the addition of ventilating and ceiling fans to the Most Efficient 2013 program. One of the stakeholders agreed with the current proposed criteria to recognize fans with DC motors. The other stakeholder, however, recommended that the Efficacy be increased to 8.0 cfm/W for all air flows which is the level required for whole-house mechanical Ventilation Fans in the current draft of ASHRAE 90.2, Energy Efficient Design of Low-Rise Residential Buildings. The stakeholder noted that most of these high efficiency fans were designed for continuous whole house ventilation which clearly indicates that fans recognized as ENERGY STAR Most Efficient could meet the stringent building code requirements. The stakeholder suggested that manufacturers could then market fans recognized as ENERGY STAR Most Efficient 2013 as the solution to ASHRAE 90.2. The movement from 7.5 cfm/W and 6.8 cfm/W to 8.0 cfm/W would only affect a small handful of potential Most Efficient eligible models, which the stakeholder feels would be outweighed by the marketing upside.	EPA agrees that it is generally a good idea for requirements to be coordinated across energy efficiency programs when feasible, but notes that the purpose of the vent fan requirement in ASHRAE 90.2 is somewhat different than the purpose of ENERGY STAR Most Efficient. EPA gathered further information on the status of ASHRAE 90.2 and discovered that it is not expected to be in effect in 2013. Thus, the suggested level will be considered for ENERGY STAR Most Efficient 2014.