

**Ingersoll Rand offers the following comments on the Proposed ENERGY STAR Most Efficient 2014 Recognition Criteria:**

1. Furnaces

**“Units will provide a signal from the blower fan that can be used to estimate static pressure across the fan.”**

- a. The value of this requirement is not clear. It is important that the furnace be set up with the proper amount of air flow which is accomplished by the automatic setup. We estimate that nearly 100% of furnaces that meet the most efficient criteria will be installed in existing homes where the ductwork is already designed and in place. Knowledge of the pressure drop will not lead to any adjustment by the installer as long as the automatic set-up was successful.
- b. There are other ways to determine pressure drop besides a signal from the blower fan such as a zoning system pressure transducer. This criteria should not dictate the design.

**“Plain text”**

- a. There should be an option to allow other methods on service and installation information making the provision for plain text a recommendation.

2. Split AC and HP’s

**“Units will provide a signal from the blower fan that can be used to estimate static pressure across the fan.”**

- c. The value of this requirement is not clear. It is important that the AC’s and HP’s be set up with the proper amount of air flow which is accomplished by the automatic setup. We estimate that nearly 100% of systems that meet the most efficient criteria will be installed in existing homes where the ductwork is already designed and in place. Knowledge of the pressure drop will not lead to any adjustment by the installer as long as the automatic set-up was successful.
- d. There are other ways to determine pressure drop besides a signal from the blower fan such as a zoning system pressure transducer. This criteria should not dictate the design.

**“Plain text”**

- e. There should be an option to allow other methods on service and installation information making the provision for plain text a recommendation.

3. Ductless

**“It is recommended that these indicators display in plain text on the consumer control.”**

- f. We agree with this as a recommendation and not as a requirement. It is important to be consistent across HVAC products. Most efficient ductless systems complete with split systems and can/should meet the same level of features.

**No requirement for automatic setup and fault reporting.**

- a. There is no reason that most efficient ductless systems cannot do automatic setup and allow access to a log displaying fault history. These are sophisticated systems in competition with split systems. Both types of systems should be held to the same criteria. If there is value to the service personnel to access the fault history on split systems, there is value to do the same on ductless. The same reasoning applies to ductless equipment

Jim VerShaw  
Chief Engineer  
Residential Solutions  
Ingersoll Rand  
6200 Troup Highway  
Tyler, TX 75707

