

April 6, 2011



ENERGY STAR
1200 Pennsylvania Ave NW
Washington, DC 20460

To Whom It May Concern,

Thank you for the opportunity to provide feedback on the ENERGY STAR® “Most Efficient” program. This designation represents an exciting opportunity to promote energy efficient products and technologies.

The experience of the Northwest Energy Efficiency Alliance (NEEA) with ductless heat pumps (mini-split heating and cooling systems) has given us a great deal of data and practical experiences with this technology. To date, the Northwest Ductless Heat Pump Project has installed over 10,000 ductless heat pumps in the Pacific Northwest, with 88 participating utilities. Based on this experience and feedback from technical experts on our team, the Northwest Energy Efficiency Alliance would like to provide the following feedback and recommendations:

- The current rating systems used to illustrate efficiency of ductless heat pumps are not an appropriate fit for the technology
 - Because current ratings test procedures were developed during a period dominated by fixed speed, cooling oriented products, they are not reflective of the performance characteristics of variable speed equipment like ductless heat pumps. Due to the variable capacity nature of inverter driven equipment, manufacturers are able to generate product ratings that are higher than actual installed performance can achieve. (see attached paper, “*Issues with Using DOE-prescribed HSPF and SEER ratings for Ductless Heat Pumps in the Pacific Northwest,*” for details)
 - To ensure ratings consistency across all models, test methods should more tightly specify the environmental conditions under which heating performance is measured
- Because product applications can vary greatly from installation to installation, it is important to discuss how application affects performance
 - ENERGY STAR could bring increased value by promoting the efficiency of ductless heat pumps relative to existing heating systems in heating-dominated climates

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- The NW Ductless Heat Pump Project has realized significant energy savings by installing a ductless system to displace the use of zonal electric heat in the main living zone
- Other regions may find that varying applications of the technology are required provide significant savings
- Sizing a system properly (factoring in application and region) can have significant impacts on performance. It would be beneficial to consider integrating this information into any documentation provided about ductless technology

Again, thank you for the opportunity to provide feedback regarding the “Most Efficient” program. Ductless heat pumps represent a great way for homeowners to save energy and improve comfort. NEEA would welcome the opportunity to work together to further refine the approach to promoting this technology.

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