

----- Message from "Braddy, Beth" <bbraddy@trane.com> on Thu, 24 Mar 2011 20:02:57 +0000 -----

To: "mostefficient@energystar.gov"
<mostefficient@energystar.gov>

Subject: "Top Tier" Energy Star Program Comments

I am responding with comments on behalf of the Trane Commercial Unitary products team as a stakeholder in Energy Star. The intent of this email is to summarize our comments on the Proposed Recognition Criteria for the Top Tier Energy Star program. Our comments are as follows:

- Many of our "high efficiency" product lines already exceed the current Energy Star requirements and would also qualify for the Top Tier program. The Recognition Criteria for the Top Tier program seem in line with expectations for such a program. However, we have found the new process for submission and approval of products within Energy Star to be cumbersome and too labor-intensive to justify the effort for many of our commercial products. Our only commercial products that currently participate in Energy Star are light commercial rooftops.
- Energy Star programs still seem to be primarily residential in focus, and have not been embraced in the commercial marketplace. This further minimizes the benefits of participation in the program for commercial product lines.

With respect to Geothermal Heat Pumps specifically:

- Energy Star listing and approval is currently a minimum requirement to qualify for federal (and some state) tax credits and rebates. Because of the link between the tax credits and Energy Star, the Energy Star label has become somewhat meaningless as a means to differentiate between levels of efficiency performance. ALL manufacturers must meet this minimum requirement to be eligible. By creating a new tier of efficiency level within the program, we run the risk of again just moving the minimum requirement up. All manufacturers would again have to comply, and no differentiation would exist.
- Energy Star qualifications for the current Geothermal Heat Pump program are flawed. AHRI ratings are only available at full load capacity. There is no rating standard for part load on two-stage or multi-stage units. Energy Star allows the part and full load ratings to be averaged to determine if a product meets Energy Star. Since there is no AHRI part load standard, there is no way to know if a manufacturer truly meets the Energy Star requirement because the rating system is subjective.
- Geothermal heat pumps are already the most energy efficiency system available to homeowners. The focus of Energy Star should be on equipment and systems that have higher efficiency levels than other systems. If a Top Tier program were to be instituted, it would be more meaningful if it identified "systems" with the most energy efficient performance in the industry vs. other systems rather than comparing to like products which will always be comparable in performance.

Thanks for your consideration of our comments as the programs within Energy Star are developed.

Respectfully,
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