



August 28, 2009

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Re: Supplemental Comments on NRCAN Draft Energy Star Specification for Heat/Energy Recovery Ventilators

The Air-Conditioning, Heating, and Refrigeration Institute (AHRI) submits these supplemental comments following the webinar organized by Natural Resources Canada's (NRCAN) on August 12, 2009 regarding the draft Energy Star specification requirements for Heat/Energy Recovery Ventilators (H/ERVs).

AHRI is the trade association representing manufacturers of heating, cooling, and commercial refrigeration equipment. More than 350 members strong, AHRI is an internationally recognized advocate for the industry, and develops standards for and certifies the performance of many of the products manufactured by our members, including air-to-air energy recovery ventilation equipment (AAERVE). In North America, the HVACR industry produces more than \$20 billion worth of product, and in the United States alone, our members employ approximately 130,000 people, and support some 800,000 dealers and contractors.

AHRI submitted comments on the two previous drafts. We expressed concerns that the program was not correctly formulated and recommended that the scope of the program be limited to residential H/ERVs. However, following the webinar of August 12, 2009, we feel that our concerns have not fully been understood by NRCAN.

We would like one more time to express our concerns with the current scope of the program. We believe that that the scope should be limited to residential models only for the following reasons:

- The draft specification requires products to be certified by HVI. However, HVI explicitly defines the scope of its certification program as residential as stated in Operation Manual HVI 920:

1. Introduction, Basis, Purpose, Overview, and HVI Label

1.1. Introduction. HVI Certification of product performance is a voluntary, cooperative, competitively policed program for obtaining, maintaining, and verifying performance ratings of residential ventilation products, and for presenting those ratings, administered by the Home Ventilating Institute.

- No testing facility exists that can test units larger than 400 CFM at -25°C for 72 hours.
- The SRE metric proposed in the draft Energy Star program is inappropriate for commercial scale H/ERV because it cannot be used to evaluate the combined efficiency of H/ERV with heating and cooling equipment.
- The specification does not address summer performance, which is very important to most commercial applications.

Therefore we strongly recommend that the proposed Energy Star program be explicitly limited to units under 400 CFM to be consistent with residential applications. As such we would like to suggest the following amendments to the title and to section 2 of the specification (proposed changes are in underline):

Canadian ENERGY STAR® Specification for Residential Heat Recovery Ventilators and Energy Recovery Ventilators (H/ERVs) sold in Canada

2) Qualifying Products: In order to qualify as ENERGY STAR, a heat/energy recovery ventilator must meet the definition in Section 1A or 1B, and comply with the testing and minimum performance requirements provided in this specification. A heat/energy recovery ventilator whose airflow capacity is in excess of 400 CFM and which is not intended for use in residential applications is not covered by this specification and cannot qualify as ENERGY STAR.

Thank you for the opportunity to comment. If you have any questions regarding this submission, please feel free to contact me or Saunders Smith at ssmith@ahrinet.org (703/524-8800).

Sincerely,



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