

Rachel,

I have two questions related to the second drafts of both the Partner Commitments and Eligibility Criteria for Energy Star Program Requirements for ASHP and CAC Equipment.

Part of the definition for Split Systems (Lines 31-34) states, "For split systems, the energy-efficiency ratings of a particular split system model are based on one of the following: 1) the condenser-evaporator combination that is the partner's most commonly sold combination for that condenser, or 2) the actual condenser-evaporator coil combination of the split system model." This statement seems to contradict both the definition for Matched Assembly and the required disclaimer language associated with the Energy Star certification mark requiring matched indoor and outdoor units, as stated in Draft 2 Partner Commitments.

Question 1:

Is EPA planning to be firm on requiring each and every indoor and outdoor unit combination to meet the efficiency standards, or will "the most commonly sold combination" approach still be allowed, resulting in Energy Star rated equipment with efficiencies lower than the nominal Energy Star SEER/EER/HSPF specification?

Draft 2 Eligibility Criteria (page 4 after line 85) has the note, "...After careful consideration and assistance from ARI in evaluating the model combination availability and the various levels and tonnages, EPA has decided to adjust the split system levels to 14 SEER/ 11.5 EER/ 8.2 HSPF..."

Question 2:

Did EPA and ARI take into account the new mix of equipment that will soon be on the market due to the new federal standard, or was the analysis solely based on equipment available today?

Thank you,
Adam

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