



June 23, 2005

Ms. Rachel Schmeltz
ENERGY STAR Program Manager
U.S. Environmental Protection Agency
Washington, D.C.

Sent by email

ENERGY STAR® Draft 2 Specification for Residential Air-Source Heat Pumps (HP) and Central Air Conditioners (CAC)

Dear Rachel,

We are responding with comments to proposal documents dated May 27, 2005.

Overall, Natural Resources Canada (NRCan) supports the necessity to upgrade the ENERGY STAR Eligibility Criteria for CAC and HP in anticipation of the introduction of more stringent federal regulated standards for this product category in 2006. NRCan also supports the Environmental Protection Agency's (EPA) request to allow more time to plan and implement the installation programs as originally proposed in Draft 1.

However, we do not support lowering the proposed EER level from 12 to 11.5 for split-systems. The document states that part of the rationale for lowering the EER is due to the limited availability of models of ENERGY STAR qualified large CAC (5 tons). As an alternative, we propose that EPA maintain the EER level at 12 for CAC/HP below a certain size (perhaps 4 tons), and lower the EER for larger equipment. This proposed option could achieve the higher EER for a very high percentage of the equipment sold. In our view, lowering the EER level could make the ENERGY STAR requirements less attractive to Canadian utilities that we see as primary stakeholders for any installation program later on.

For heat pumps, this draft proposes lowering the Draft 1 HSPF requirement from 8.5 to 8.2. Because heating consumes more energy than cooling in cold climates, EPA should reconsider the higher HSPF.

NRCan supports eliminating the gas/electric package units until there is a high efficiency heating requirement. In colder climates the energy use for heating will be higher than that used for cooling. Also, allowing lower heating efficiency is inconsistent with the ENERGY STAR requirements for furnaces.

NRCan also supports the labelling proposal which includes a requirement to add a disclaimer statement on proper sizing and installation of equipment. Natural Resources Canada will provide a translated version of the statement for ENERGY STAR Partners that produce material for the Canadian marketplace should this proposal go ahead.

In addition, we also have several comments and suggestions for the definitions section:

- The definition for EER should indicate the test temperature of 95F / 35C, since EER can be measured at any temperature.

- The last part of the *Matched Assembly* definition is somewhat confusing. It won't be possible to include specific air handler or furnaces in most cases. The intent is that air flow must be similar (or the same?) as that used in rating the equipment, and this may force changing the fan and motor.
- Is it the intention of ENERGY STAR to ensure that all units in *matched assemblies* be ENERGY STAR qualified, where applicable (i.e. gas furnaces for example)?
- In Canada's Federal Energy Efficiency Regulations, the 3- phase equipment is treated the same as the single phase – not included in light commercial, so that is how Canada would also include the 3-phase equipment along with single phase equipment.

Finally, in terms of product reporting, it is stated in a note that stakeholders will be encouraged to use the CEE - ARI web listing; and for manufacturers not reporting through ARI, they are to submit directly to ENERGY STAR. What is the plan for publishing lists of qualified products – will there be two lists or a blended list from both organizations on the ENERGY STAR listing? Also, if manufacturers are submitting to ENERGY STAR directly, who will verify the EER?

Thank you for providing us with the opportunity to comment on Draft 2 of this specification.

Regards,

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