

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



OFFICE OF
AIR AND RADIATION

August 2, 2005

Dear Air Source Heat Pump/Central Air Conditioner Manufacturers and Other Interested Parties:

Upon further consideration, EPA has concluded that it is necessary to make an adjustment to the proposed ENERGY STAR criteria for split system central air conditioners. In the Final Draft of the ENERGY STAR specification for central air conditioners and ASHPs that was distributed on July 1, 2005, EPA proposed energy-efficiency criteria of 14 SEER/12.0 EER/8.5 HSPF for these units. At this time, EPA is making the following change:

- Energy-efficiency criteria for split systems have been adjusted to 14 SEER/11.5 EER/8.2 HSPF.
- A second tier, effective January 1, 2009, for split systems has been added with energy-efficiency criteria at 14.5 SEER/12 EER/8.2 HSPF.

EPA concluded that delaying the 12 EER requirement is appropriate due to renewed concerns about product availability and because of potential inaccuracies in unverified EER values for model combinations with third party coils.

Consistent with the principles under which the ENERGY STAR program operates, it is EPA's goal to set a specification that distinguishes top performing products while ensuring that the market offers consumers a range of qualified product from which to choose. Despite evidence, based on analysis of the existing database and successful rebate programs at the 12 EER level, that an adequate supply of 12 EER product exists, equipment manufacturers have asserted that previous rebate program experience and the ARI-CEE database are not reliable indicators of what will be available in 2006. They claim existing model combinations will be obsolete and therefore offerings at the 12 EER level will be restricted due to a focus on meeting the new federal minimum standard that goes into effect in January, 2006.

The number of model combinations that would meet a 12 EER requirement in 2006 and beyond is uncertain for a second reason. As part of the specification review process, EPA was provided information indicating that the currently accepted use of modeling rather than laboratory testing within the federally mandated test procedure to evaluate EER for third-party coil systems can lead to an overstatement of performance. The Department of Energy (DOE) is currently examining the simulated ratings programs used by independent coil manufacturers and is considering alternatives. In the near term, EPA is concerned that the market for 12 EER systems would be dominated by third party coil systems that may not deliver promised savings.

Earlier this year, ARI, DOE and individual equipment manufacturers instituted a verification effort that will laboratory test most split systems models in the ARI database within the next three years. As the testing proceeds, this program promises to significantly improve the quality of the EER data for CAC systems listed in the ARI database.

In summary, EPA has concluded that an additional three years is warranted before the ENERGY STAR specification for split system central air conditioners goes to 12 EER to ensure adequate product availability and to allow the ARI verification process to improve EER ratings for third-party coil systems so as to eliminate any potential competitive advantage to product that does not deliver promised savings. With this additional notice, experts in the industry have suggested that it would be reasonable to expect that systems could be optimized to achieve a 14.5 SEER along with the 12 EER.

No other changes have been made to the Final Draft ENERGY STAR specification for CAC and ASHP.

All interested parties are encouraged to review the changes made to the final draft specification and **provide comments by August 23, 2005**. This relatively short comment period will enable EPA to finalize the specification in time for it to go into effect shortly after the new Federal Standard for this equipment in January 2005. Please note, **no extensions will be granted for this comment period**.

Please send all comments to me at schmeltz.rachel@epa.gov. Should you have any questions about the Final Draft specification please contact me via e-mail or phone at (202) 343-9124.

Regards,

A handwritten signature in black ink, reading "Rachel Schmeltz". The signature is fluid and cursive, with the first name "Rachel" and last name "Schmeltz" clearly distinguishable.

Rachel Schmeltz
ENERGY STAR Program Manager