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July 22, 2005

Ms. Rachel Schmeltz
U.S. Environmental Protection Agency
Office of Air and Radiation
1200 Pennsylvania Avenue NW
Washington, DC 20460

Re: Energy Star Proposals for Central Air Conditioners and Heat Pumps – Final Draft

These are the comments of Southern Company on the “Final Draft” proposed 2006 Energy Star Standards for central air conditioners and heat pumps.

Southern Company (Southern) is the parent firm of five electric utilities in the southeastern United States: Alabama Power, Georgia Power, Gulf Power, Mississippi Power, and Savannah Electric. These electric utilities serve over 3.7 million customers, including 3.2 million residential and 479,000 commercial customers. Our 120,000 square mile service territory includes most of Georgia and Alabama, southeastern Mississippi, and the panhandle region of Florida.

Southern Company is an active participant in the Energy Star™ program, and appreciates the opportunity to comment on the proposals.

While Southern Company would still prefer an HSPF for split system heat pumps lower than 8.2, and would prefer a minimum gas heating efficiency on gas/electric package units, these are not sufficient reasons to oppose the “Final Draft” plan as presented. Overall, the proposal is a reasonable, cost-effective standard for high efficiency residential-type heat pumps and air conditioners.

EPA states in the “Final Draft” document that raising the minimum EER from 11.5 to 12 does not have a significant impact on product availability. Assuming this is correct, Southern does not object to raising the minimum EER for Energy Star qualification.

Our only concern with raising the minimum EER is the issue of dehumidification. It has been our experience that single-speed, high EER air conditioning and heat pump equipment tends to have less dehumidification capability, especially during mild temperature, humid outdoor conditions. Failing to maintain 60% relative humidity conditions can result in indoor air quality problems such as mold growth. This is more of a problem in very humid climates, such as the Gulf Coast. While beyond what can be reasonably attempted in this round of rulemaking, a requirement for better humidity

control in very humid areas would be useful. Problems of this nature could be greatly reduced by simply requiring variable speed operation for units installed in very humid areas. We do not propose that humidity control requirements be included for this round of Energy Star standards, but should be considered for future changes to the residential air conditioner and heat pump Energy Star standards.

Thank you for the opportunity to comment on these Energy Star™ proposals.

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