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June 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

These are the comments of Southern Company on the "Draft 2" 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.

Southern Company approves of the changes made since Draft 1, in particular the HSPF of 8.2 which is now proposed for heat pumps. While this value is still somewhat high, it is a significant improvement over the previous requirement of an 8.5 HSPF. As shown in the Draft 2 Criteria document, 3.4% of split system heat pump units would have qualified under a standard of SEER 14/EER12/HSPF 8.5, while 7.4% would qualify under a standard of SEER 14/EER 11.5/HSPF 8.2. While this is a substantially lower percentage of units than would qualify under the air conditioning standard of SEER 14 and EER 11.5, it is a substantial improvement.

While we would prefer a value lower than an HSPF of 8.2, this is a much more reasonable proposal than the previous requirement of an 8.5 HSPF.

For gas/electric package units, it would appear reasonable to require the gas heating portion of the system to meet the Energy Star™ requirement for gas furnaces, which includes an AFUDC of 90%. Otherwise, a package Energy Star™ system could have a 78% AFUDC gas heating unit with a cooling efficiency of SEER 14/EER 11, while a split system Energy Star™ gas furnace/air conditioner combination would require a 90%

efficient gas furnace and a cooling efficiency of SEER 14/EER 11.5. This is not a comparable efficiency level for the gas heating portion.

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

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