

June 24, 2005

Rachel Schmeltz

ENERGY STAR Product Manager
Environmental Protection Agency
Ariel Rios Building, SW, MS 6202J
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Ms. Schmeltz:

SWEEP is writing in response to the Draft 2 specification for ENERGY STAR qualified central air conditioners and heat pumps. First, SWEEP is very pleased to see that EPA is proposing to separate the ENERGY STAR equipment specification from an ENERGY STAR equipment installation program. As we noted in our previous comments, this will make the overall program much easier to implement and enforce. Having said this, we support developing the ENERGY STAR air conditioner and heat pump installation program by January, 2007. Once again we urge EPA to make this program potentially applicable to all central air conditioners and heat pumps, not just those meeting the ENERGY STAR equipment specification. We believe this will increase the level of contractor participation and energy savings resulting from the installation program. At the same time EPA and partner organizations can promote the combination of ENERGY STAR equipment and installations where appropriate in order to encourage maximum cost-effective energy savings.

Second, SWEEP urges EPA increase the EER requirement for split systems central air conditioners and heat pumps to EER = 12.0. The reasons for this are explained in detail in comments submitted by CEE, which SWEEP has signed on to. This requirement is particularly critical in the southwest states that SWEEP works in where peak electricity demand is growing rapidly. Growing peak electricity demand and declining load factors are big problems for utilities throughout the southwest and mountain states. Requiring an EER of 12 rather than 11.5 will increase the peak demand reduction from ENERGY STAR equipment and thereby increases the economic benefits for consumers and utilities. As noted in the CEE comments, many utilities already promote SEER = 14, EER = 12 equipment as part of their rebate programs, and many products are already available with an EER of 12 or greater. We believe more utilities will require EER = 12 or greater over time once the new federal standard takes effect. Nevada Power Company, for example, is planning to implement a SEER=14, EER=12 threshold for its rebate programs starting in 2006. It makes sense to align the minimum efficiency requirements in the utility and ENERGY STAR programs. In addition, air conditioner manufacturers no doubt will respond and produce more systems that meet an EER = 12 threshold, and do so at all sizes, should EPA set the new ENERGY STAR threshold at EER = 12 in conjunction with utility rebate programs moving in this direction.

Thank you for considering these comments.

Sincerely yours,

Howard Geller
Executive Director
Southwest Energy Efficiency Project (SWEEP)
2260 Baseline Rd. #212
Boulder, CO 80302