



The United Illuminating Company
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October 27, 2004

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:

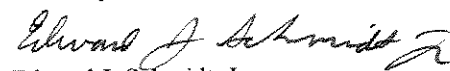
The United Illuminating Company (UI) wishes to take this opportunity to provide input on options for revising the ENERGY STAR Central Air Conditioner and Air source Heat Pump Specification (Specification). UI has been and will continue to be a strong supporter of the ENERGY STAR labeling program, in general and with respect to central air conditioning and heat pumps.

UI is pleased with the apparent recognition that the revised specification for residential central air conditioning should now move beyond a simple, SEER-based equipment specification to a comprehensive model that addresses the systems as a whole. Rather than build the specification primarily around equipment, UI would find appealing a specification that emphasizes installation practices and technician certification, such as the current draft specification language incorporates. Rather than raise systems and installation as what appears to be secondary to the SEER level, we would support this being the foundation of the specification. As an alternative to the SEER-based equipment component of the current discussion, UI would suggest consideration of a mandate for ECM fan motors, which can yield electrical savings at least equivalent to a 1 SEER increment to the equipment. With respect to the systems approach, technician certification and best-practice installation coupled with a specification that requires diagnostics such as available through CheckMe! and tools like the Honeywell Service Advisor, would be supported by UI. Furthermore, motion toward a system of third-party, in-field verification that would neither offend contractors nor create customer service problems for program sponsors (i.e., utilities and similar entities) would be viewed with cautious optimism by UI.

The emergence of the new minimum standard of SEER 13 central air conditioning units creates a significant amount of pressure upon energy efficiency program sponsors such as UI with respect to continued financial incentives on central air conditioning equipment alone. While we recognize the value of an equipment-based specification related to a SEER rating significantly higher than the incoming standard of SEER 13 and would support it at least with awareness and education efforts, UI views the combination of low run-hours (and thus incremental savings), high incremental costs and evidence suggesting issues associated with proper sizing and installation (over-sizing, duct leakage, poor air flow and improper charging) as indicative of a need to change the focus of the ENERGY STAR symbol to installation so that whatever SEER is installed, it is operating as efficiently as is reasonably possible.

Again, The United Illuminating Company appreciates the opportunity to participate in the specification development process and values its role as an ENERGY STAR partner.

Sincerely,


Edward J. Schmidt, Jr.