



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

OFFICE OF  
AIR AND RADIATION

November 18, 2010

Dear ENERGY STAR<sup>®</sup> Light Commercial HVAC Stakeholder or Other Interested Party:

The purpose of this letter is to propose that the efficiency levels currently in effect under the Version 2.1 (Tier 1) ENERGY STAR LC HVAC Specification remain in effect until further notice. As such, the U.S. Environmental Protection Agency (EPA) is circulating Draft Final Version 2.2 for your review. The only change proposed in this draft is removal of the Tier 2 placeholder in the current version of the specification. We welcome your input on the attached Draft Final Version 2.2 ENERGY STAR Light Commercial (LC) HVAC Specification.

The original Version 2.0 Tier 2 placeholder, scheduled to take effect on July 1, 2011, was included to allow for any necessary adjustments to be made to the specification as more Integrated Energy Efficiency Ratio (IEER) data became available. EPA has decided not to propose Tier 2 levels at this time for the following reasons:

- **Market Penetration:** The 2009 ENERGY STAR market penetration of LC HVAC is 37%. However, since the Tier 1 levels went into effect on May 1, 2010, the 2009 data does not reflect the new levels. Based on EPA's review of the marketplace, it appears that the Tier 1 market penetration is much lower than the 2009 results.
- **Product availability:** An analysis of models available on the market (i.e. those included in the Air-Conditioning, Heating and Refrigeration Institute (AHRI) directory) indicates that the current ENERGY STAR requirements remain an effective differentiator of the most efficient units. For example, only 7% of the Heat Pump products in the  $\geq 65,000$  to  $< 135,000$  Btu/h category meet ENERGY STAR Tier 1 levels. Further, an increase in stringency raises potential concerns in terms of adequate product selection and cost-effectiveness to the consumer.

EPA is committed to keeping the LC HVAC specification current to meet today's market demands. In order to make the best decision possible in revising these levels, EPA will monitor the market and propose new requirements, as appropriate. EPA will also monitor the industry response to new performance levels recently proposed by the Consortium for Energy Efficiency (CEE) for LC HVAC products.

**Comment Submittal**

Stakeholders are encouraged to provide written comments for EPA consideration to [LCHVAC@energystar.gov](mailto:LCHVAC@energystar.gov) by **December 10, 2010**. All comments will be posted to the ENERGY STAR Product Development website unless the submitter requests otherwise. EPA expects to finalize Version 2.2 ENERGY STAR LC HVAC specification by the end of the year.

To track EPA's progress in revising this specification, visit the Product Development website at [www.energystar.gov/revisedspecs](http://www.energystar.gov/revisedspecs) and click on "Light Commercial Heating and Cooling".

Please direct any specific questions to Abigail Daken at EPA, [daken.abigail@epa.gov](mailto:daken.abigail@epa.gov) or 202-343-9375 and Rebecca Duff, ICF International, at [rduff@icfi.com](mailto:rduff@icfi.com) or 202-862-1266. Thank you for taking the time to review this draft specification.

Sincerely,

A handwritten signature in cursive script, appearing to read "Abigail Daken".

Abigail Daken  
U.S. Environmental Protection Agency  
ENERGY STAR HVAC Program