



Together We Can Change
National Markets

June 10, 2005

Rich Karney
ENERGY STAR Program Manager
US Department of Energy
1000 Independence Avenue SW
EE2J
Washington, DC 20585

Dear Rich:

Thank you for the opportunity to submit comments on the proposed scope expansion of the ENERGY STAR room air conditioner criteria to include reverse-cycle (heat pump) units. The following comments are submitted on behalf of the CEE Appliance Committee (the Committee), and supported by the organizations listed below.

The Committee supports the inclusion of reverse-cycle units in the criteria under the existing performance level of 10% more efficient than the federal minimum standard (as measured by Energy Efficiency Ratio or EER). Several members of the committee have expressed an interest in adding reverse-cycle units to their existing room air conditioner incentive programs once they carry the ENERGY STAR label.

The Committee questions, however, the lack of a heating component within the qualification criteria. While it is the Committee's understanding that heating performance is not measured within the current federal test procedure, the group believes that the ability to measure and communicate the expected energy savings during the heating season (as well as the cooling season) is important to the success of this product category.

Therefore, the Committee asks that DOE consider development of a procedure that would test the performance of reverse-cycle room air conditioners while in heating mode. As a first step, the group asks that DOE set a schedule outlining the steps necessary to achieve that end.

On a related note, due to the similarity of function performed and technology used, the inclusion of reverse-cycle room air conditioners in the ENERGY STAR program begs the question of the future inclusion of Packaged Terminal Air Conditioners (PTACs). The Committee urges DOE to expedite its efforts to include PTACs in the program; due to the larger market size, the potential energy savings far outstrip those available from reverse-cycle room air conditioners. The Committee looks forward to the opportunity to work with DOE to set appropriate efficiency criteria for these products.

Again, the Committee would like to thank DOE for the opportunity to comment on the proposed inclusion of reverse-cycle room air conditioners within the existing ENERGY STAR room air conditioner criteria. Please contact CEE Residential Program Manager Rebecca Foster at (617) 589-3949 ext. 207 with any questions about these comments.

CONSORTIUM FOR ENERGY EFFICIENCY

98 N. Washington Street, Suite 101 Boston, MA 02114 617-589-3949 www.cee1.org



Together We Can Change
National Markets

Sincerely,

Marc Hoffman
CEE Executive Director

Supporting Organizations:

New York State Energy Research and Development Authority

PacifiCorp

Sacramento Municipal Utility District

Xcel Energy