To: Richard H. Karney  
From: Larry Hammil

Thank you for the opportunity to comment on the Energy Star changes.

I disagree with the new maps for the following reason:

- Los Angeles (130 vs 144), San Diego (349 vs 372), and Honolulu (4537 vs 4550) according to your spreadsheet actually uses more energy with the new specifications. There may be costs savings in dollars but the actual energy savings, which you are most concerned about, is actually a loss. Cost savings is a variable that is a function of the market and thus cannot be controlled through these methods. These are obviously large markets with a large impact on energy usage. I feel that for this reason Los Angeles and San Diego should be put back in the southern zone.

I agree with the 3-zone map for the following reasons:

- The philosophy that cooling energy savings in those regions would be more noticeable in comfort.
- Why bother confusing the map by splitting the Central region? The .55 is most likely a vinyl window with hard coat. The .40 can be met with the same product using a more efficient spectrally selective coating. The hard coat industry is just going the route of aluminum windows. The energy losses/gains are balanced between hard coat and SSC.
- The .65 is not hard to meet with aluminum and spectrally selective coating. By cutting the southern section down to Texas and Florida areas, the .65 area has been limited considerably over the old Energy Star map. For consistency sake, why not include the corner of California and Arizona that have the >6300 CDD in the southern zone?

But:

- Los Angeles (130 vs 144) and San Diego (349 vs 372) should be put back in the southern section.