

Holly,

Thank you for the opportunity to comment on the Version 6 and Version 7 draft specifications for room air conditioners. As we have discussed previously, GE Appliances respectfully requests that the Version 7 spec be reopened for comment. The timing and timeline of the comment period for the initial draft specification did not allow us to provide meaningful comment on the draft. We look forward to working further with Energy Star on the Version 7 specification.

As to the Version 6 specification, GE Appliances requests that Energy Star set the Version 6 specification for Type 3 products to the levels below.

Type 3 Heat Pump	E-star 6.0
CEER	13.2
HEER	6.8
17F heating capacity	58%
COP @17F	1.75

We believe that the levels proposed in the draft Energy Star released will limit participation in the Energy Star program for window heat pump products and prevent using the Energy Star brand to communicate to consumers the significant energy savings potential of heat pump products. GE Appliances will soon release products meeting the above specifications. Because of product development timelines, if the specification for reverse cycle products is not set at the levels above, we will not be able to participate in the Energy Star program for these products.

In addition, we have concerns about the proposed levels independent of our own products. Our testing shows that in order to reach 70% capacity at 17°, the fans speeds required produce noise levels that will be unacceptable to consumers. Another approach could be to reduce the rated capacity at 47°, but we have two significant concerns about this approach. First, consumers are likely selecting window air product capacity for their cooling needs and the heating load demand on a given space will generally be higher the cooling load. We should, therefore, be providing the full heating capacity of the product whenever possible. Second, there have already been restrictions placed on derating capacity at warmer temps in order to obtain better capacity ratios at lower temps in other HVAC products. We are concerned that similar restrictions will be placed on these products in the future, similar to the rating requirements for cooling capacity for room air conditioners at 10 CFR 429.15(c), which do not allow for derating.

Finally, we don't believe it is appropriate for Energy Star to set a specification for Type 1 Heat Pumps. We don't believe Energy Star should provide brand support for heat pump products that provide so little practical heating capability, and we are concerned Type 1 products will damage consumer perception of room heat pumps – thus limiting market transformation opportunities.

We appreciate the opportunity to provide these comments.

Best,

John

John Schlafer | Associate General Counsel | GE Appliances, a Haier company

T: (502) 452-7603 | M: (317) 674-2934 | john.schlafer@geappliances.com