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Holly Tapani  
Product Manager ENERGY STAR HVAC  
U.S. Environmental Protection Agency  
ENERGY STAR HVAC Program

By E-mail

**RE: Midea Comments on ENERGY STAR Versions 6.0 and 7.0 Room Air Conditioner (RAC) Draft 1 Specifications**

Dear Holly Tapani:

Midea America Corp. (“Midea”) imports and sells various home appliances, including room air conditioners, in the US. We are grateful for your efforts in developing the ENERGY STAR Versions 6.0 and 7.0 Room Air Conditioner (RAC) Draft 1 Specifications and welcome the opportunity to provide input.

**Midea supports EPA’s updates regarding heating mode efficiency for RHP’s in Version 6.0, while leaving other requirements unchanged.**

**However, Midea strongly encourages EPA to adopt a standard that requires heating capacity at 47°F to match cooling capacity at 95°F.** The current specification would permit manufacturers to derate their heating capacity, which will likely cause consumer confusion.

**Midea supports Type 3 RHPs requiring a 70% heating capacity ratio (HCR) at 17°F/47°F.** Midea encourages EPA to reconsider lowering the Type 3 HCR at 17°F/47°F requirement from 70% to 55%. We believe maintaining the 70% HCR is crucial for several reasons:

- **Market Growth:** It encourages manufacturers to develop Type 3 products that meet the 70% HCR at 17°F /47°F using variable speed compressor technology. Variable speed compressors offer significant energy savings and performance benefits with a minimal upfront cost increase. Variable speed compressors are increasingly being adopted today, with expectations that the new DOE minimums will drive more adoption and lower the already minimal upfront cost.
- **Performance and Consumer Benefits:** Products meeting the 70% HCR will provide more effective primary heating, reducing reliance on inefficient electric resistance heat sources. A 55% HCR for an 8kBTU or below unit would provide less heat output than a portable heater which may steer consumers away from heat pumps.
- **Market Alignment:** The 70% HCR has a strong affiliation with existing cold climate specifications.
- **Consumer Confidence:** A 55% HCR may limit consumer confidence in the performance of Type 3 RHPs. We believe the 70% HCR will differentiate less effective products from falling under the ENERGY STAR program.

**Midea recommends removing Type 1 and Type 2 heat pumps from the ENERGY STAR scope.** These products are not suitable for providing adequate heating for consumers and may limit market adoption of heat pumps based on damaged consumer perception. If not removed for V6, we strongly urge their removal for V7.

**Midea strongly requests that EPA reevaluate the stated payback periods for Room Heat Pumps.** We believe it is more appropriate to compare Type 3 and Type 4 units to the cost of a mini-split system, including installation.

**Midea appreciates EPA's alignment of Version 7.0 with the new federal minimums for RACs, effective May 26, 2026, as well as the lead time provided to manufacturers.**

**Midea supports an industry-approved label recommendation to provide consumer education and prevent misleading marketing.** Consumers need to be aware of the differences between the four types of RHPs. We recommend that the label be developed by AHAM with ENERGY STAR support, as this would benefit both ENERGY STAR and non-ENERGY STAR products. Midea plans to provide feedback to both AHAM and EPA on the label proposed by EPA.

Thank you for your consideration. Should you have any questions or wish to discuss any of the points made in this letter, please reach out to me.

Best Regards,

*Sarah Chinberg*

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