



Air Conditioning Contractors of America

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February 23, 2020

Mrs. Jane Nishida
Acting Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460

Re: ACCA Public Comments on EPA proposed rule, *Final Draft Version 6.0 ENERGY STAR Central Air Conditioner and Heat Pump Specification*. Submitted online via email: CACASHP@energystar.gov

Dear Mrs. Nishida:

The Air Conditioning Contractors of America (ACCA) is the national association of heating, ventilation, air conditioning, and refrigeration (HVACR) contractors, with an approximate membership of 3,000 corporations representing more than 60,000 professionals; including, business managers, engineers, technicians, installers, and other industry specialists. ACCA also supports municipal governments, trade schools, and allied partners with corporate sponsorships that include other industry sectors such as manufacturing, distribution, insurance, design, and training. ACCA has led, and continues to lead, the HVACR industry's technical needs by developing and maintaining industry-recognized ANSI standards. ACCA appreciates opportunity to comment on this proposal regarding the Final Draft Version 6.0 specification for installation criteria.

This rule seeks to promote quality installation by requiring certain capabilities in central air conditionings (CACs) and heat pumps (HPs) to certify as ENERGY STAR. ACCA is a longstanding advocate of quality installation for HVAC systems and the ENERGY STAR program and therefore acknowledges and respects the intended goal. Moreover, we sincerely hope that this rule results in more systems being installed correctly.

We believe that there is opportunity for improvement regarding standards for installation capabilities of systems under this rule. More specifically, for preprogrammed system tests, we believe that ENERGY STAR as well as the industry at large would benefit from the implementation of a unified standard on communications protocol that would require these systems to report the same data in the same format in accordance with recognized American National Standards Institute (ANSI) standards. A unified reporting standard or language would reduce confusion and streamline the process of data analysis and certification for ENERGY STAR systems.

This is not to say that there should be a single standard on *how* said data is collected. Rather, that the data these systems collect and produce should *look* the same regardless of how they were collected. ACCA will gladly share more information regarding the development of and precedent for such a standard upon request. Moreover, we are happy to work with ENERGY STAR and industry stakeholders towards its development.

THE ESSENTIAL PARTNER FOR CONTRACTOR EXCELLENCE



We respectfully ask that you take our request into consideration when finalizing this rule as well as future rules pertaining to the certification and installation of ENERGY STAR systems.

Sincerely,

A handwritten signature in blue ink, appearing to read "CC". The signature is fluid and cursive.

Chris Czarnecki
Government Relations Manager
Air Conditioning Contractors of America