

CAC/ASHP Draft 2 V5.0 Comment Matrix

Topic	Comment	EPA Responses
Regional Specification		
Regional Specification	We would like to commend EPA on adopting a national approach within this proposed specification rather than a regional approach.	Thank you for your comment.
Performance Criteria		
General	We are supportive of the EPA proposals within the Draft 2 Version 5.0 CAC/ASHP specification and applaud EPA's harmonization of levels between ENERGY STAR and CEE Tier levels.	Thank you for your comments. EPA seeks to harmonize requirements with CEE and other efficiency sponsors wherever possible.
Split System Levels	We continue to recommend that EPA look at higher SEER and EER values than the SEER 15 and EER 12.5 currently proposed for split systems. We recommend that EPA consider setting a second tier specification to take effect one-year after the initial specification (i.e. September 2016, based on the current proposed effective date.). We recommend that EPA consider a specification of SEER 16 and EER 13 for this second tier specification. This specification would correspond to the former CEE Tier 3 specification and the Section 25 C tax credit levels. A similar, two tier specification was utilized during the last ENERGY STAR CAC/ASHP update.	Rather than create a tiered specification, EPA prefers to rely on regular review to ensure that specifications remain relevant. Like many of our stakeholders, EPA anticipates highly efficient reasonably priced split systems to become more prevalent in the market in the next few years.
Single Package Levels	We suggest that at these levels, product availability still remains limited. Although there are relatively few CEE members that have program offerings for single packaged heat pumps, those members who do promote this equipment indicate that the proposed ENERGY STAR requirements for packaged heat pumps could hinder program viability. To avoid a scenario where product availability is overly restricted, or is limited to a set of product options that are not cost-effective, CEE recommends slightly lower SEER and HSPF requirements to align with the proposed CEE Tier 1 at 14.5 SEER and 8.1 HSPF.	EPA recognizes the value of harmonizing with CEE levels, but in this case however, EPA believes it is appropriate to move forward with the proposed SEER and HSPF requirements.

Third Party Certification		
Coordination with AHRI	<p>In 2010 EPA made significant changes to the ENERGY STAR requirements for CAC/ASHP and furnace products, which resulted in a dramatically increased burden to manufacturers. The result of these changes has been a dramatic and continuing decline in the level of participation in the ENERGY STAR program by CAC/ASHP manufacturers. The EPA published letter of February 2014 to AHRI announced impactful steps to more closely align the AHRI certification program and EPA's requirements for ENERGY STAR. We support these actions as significant steps in reforming the ENERGY STAR program. But as ENERGY STAR participation continues at very low levels within the Industry, we recommend further reform to the ENERGY STAR program to match the test requirements of the current AHRI program.</p>	<p>EPA will continue to look for opportunities to reduce the burden further and while maintaining the integrity of the program.</p>
Independent Coil Manufacturers		
General Inclusion	<p>While we understand that EPA intends that only those ICM combinations using condensing units that are part of an ENERGY STAR certified system manufacturer combination would be eligible for inclusion, provided that they meet the appropriate system ratings, we would like to point out that this is not explicitly stated in the draft specifications.</p> <p>We would support EPA's proposal to add ICMs within the ENERGY STAR program, only if EPA requires that ICMs follow the same ENERGY STAR procedures as system manufacturers, so that the process is equitable for all entities.</p> <p>Requirements should include:</p> <ol style="list-style-type: none"> 1. No ENERGY STAR labels would be allowed on indoor units by either ICM's or SM's. 2. For verification, ICM's that use only simulation results to rate combinations must follow the single test approach. 3. ICM's would only be eligible for the multiple test approach, if they have actually tested at least two samples to develop the ENERGY STAR combination rating. 4. For verification testing in the multiple test approach, the additional indoor samples provided should be tested with the same, original outdoor unit. 	<p>EPA provides the following clarifications:</p> <ol style="list-style-type: none"> 1) As for all product types, ICMs will be required to become ENERGY STAR partners in order to qualify products for ENERGY STAR. 2) As is currently the case, no ENERGY STAR labels would be allowed on any indoor units. (This will be clarified in the Identity Guidelines.) <p>In addition, EPA has added language in the Final Draft specification reflecting our intention that the ICM combination must use a outdoor unit which is part of an ENERGY</p>

	<p>ICMs should join as ENERGY STAR partners. An ICM can only be eligible for the single test approach provided that the ICM actually tests at least two samples to develop an ENERGY STAR combination. If an ICM uses the multiple test approach and fails the first sample test, the three additional indoor samples provided upon a failure of the first test would be tested with up to three additional samples of the original outdoor model with previously verified performance. The ICM would be responsible for the cost associated with procuring the additional samples associated with an outdoor model.</p>	<p>STAR certified SM combination.</p> <p>Regarding verification testing, EPA does not anticipate issues of unfairness from allowing ICM combinations rated with simulation to use either single or multiple sample approach. In addition, for the multiple sample approach, multiple samples of ICM coils will be tested with the same single sample condensing unit. Verification testing policies will be refined and developed as the need arises.</p>
	<p>We support the addition of ICMs into the CAC/ASHP program. Including third-party coils in the specification would both recognize an existing market reality and greatly expand the number of combinations that are eligible for both the label and program support.</p>	<p>Thank you for the comment</p>
Certification	<p>How would ICM's that do not participate in a mandatory testing and certification program comply with the ENERGY STAR program? We suggest the Agency incorporate mandatory certification testing requirements for ICM's not involved in an approved certification program.</p>	<p>All ICMs must be ENERGY STAR partners before including their product(s) in an eligible combination and will be required to participate in the third party certification.</p>
Other		
FTC Label	<p>We suggest that the language in item 3.E be reviewed to align with upcoming changes to the FTC label. Effective January 1, 2015 the Energy Guide label will be changing from a single point representation to show the range of efficiency for a given outdoor product. AHRI is commenting on suggested language to align this item with the upcoming FTC change and we support this position.</p>	<p>Thank you for the comments. These changes are incorporated into the final draft of the specification.</p>
Partner Commitment	<p>Under Program Requirements, one could interpret the section 5.3.1 requirement to apply to ductless systems as well. We would like EPA to revise clause 5.3.1 to make it clear that ductless systems are excluded from this requirement.</p>	
Definitions	<p>In 1) G. line 32 should read: "...total space heating required in Region IV during..."</p>	

EPA Brand Book		
EPA Brand Book	On page 4.2 of the ENERGY STAR brand book states that, "When using the Certification Mark in association with a certified heat pump or central air conditioner, the following disclaimer must appear: "This product meets ENERGY STAR requirements when appropriate coil components are used. Ask your contractor for details." The above language basically extends the requirement for all air conditioners and heat pumps, including single package and ductless equipment; this language should not apply to ductless and single package systems, and we would like EPA to address this clarification with the Draft 2 Version 5.0 product specification revision.	EPA will make this change in the EPA Brand book.
Timing		
General	We agree with the proposed September 2015 implementation timing. This will allow for manufacturers and the supply chain to transition to the new requirements in an efficient manner.	Thank you for your comment.