

## Draft 1 Version 3.0 Light Commercial HVAC Comment Matrix

Topic	Comment	Response
Re-assess Efficiency Criteria	Several stakeholders suggest that EPA re-assess the efficiency criteria for Air Conditioners, Heat Pumps, and Variable Refrigerant Flow Equipment.	EPA has re-assessed the levels proposed in Draft 1 and proposes different levels for all equipment types in Draft 2. CEE Tier 1 or 2 levels offer a good balance of availability and differentiation for most equipment types. VRF equipment offers higher part load efficiency, so proposed IEER levels are higher than for unitary equipment.
Delay VRF	Several stakeholders recommend that EPA delay the development of efficiency levels for Variable Refrigerant Flow Equipment until after the DOE rulemaking.	EPA acknowledges the concern for delaying VRF levels, but delaying until DOE finishes its work is impractical given the compliance date for new Federal regulations.
Provide Supporting Data	One stakeholder requests that EPA provide data to support its decisions.	With this draft, EPA is providing supporting data for our decisions.
Support Alignment with DOE 2023 Minimums	One stakeholder supports aligning ENERGY STAR efficiency criteria with the DOE 2023 minimums.	EPA has decided not to align with DOE 2023 minimums, as further analysis showed that alignment would severely limit model selection. Instead, EPA proposes levels that will encourage the market to move towards the aggressive 2023 standards.
< 65,000 Btu/h Equipment	Two stakeholders recommend re-assessing the <65,000 Btu/h category cost and payback data.	EPA reached out to stakeholders to discuss more accurate cost and energy data. No new data was supplied to EPA so this equipment types continues to be out of scope in Draft 2.
COP at 17° F	One stakeholder recommends including the COP at 17°F as a performance requirement and harmonizing COP levels with the CEE Commercial Unitary Pumps Specification.	EPA will include COP at 17°F since it is already a metric that is certified by AHRI.
EER and IEER Metric Use	Two stakeholders support the inclusion of both IEER and EER metric requirements in the specification.	EPA agrees that both metrics offer distinct benefits for measuring performance.
Sampling Requirements	Three stakeholders suggest that the multiple sample approach is not reasonable for this product category. Commercial equipment is expensive and not mass-produced. The stakeholders recommend considering an additional approach for commercial products where a 5% testing tolerance is provided without retaining three samples.	EPA agrees that making four units available for test when units are built specifically for testing can be burdensome. EPA will propose a modified approach before the effective date of the revision. Manufacturers are also free to continue using the single sample approach.