



Lennox International Inc.
2140 Lake Park Boulevard
Richardson, Texas 75080-2254

Mailing Address:
P.O. Box 799900
Dallas, Texas 75379-9900

Telephone: 972.497.5000
Facsimile: 972.497.6668
LennoxInternational.com

David Winningham
Sr. Engineering Manager, Regulatory Affairs
Telephone: 803-738-4085

September 05, 2018

Ann Bailey
Director, EPA Energy Star Product Labeling
United States Environmental Protection Agency
Washington, DC 20460

Submitted via e-mail: MostEfficient@energystar.gov

Re: ENERGY STAR Most Efficient 2019 Proposed Criteria, Central Air Conditioners, Heat Pumps and Geothermal Heat Pumps

Lennox International Inc. (Lennox) hereby submits comments on the *United States Environmental Protection Agency (EPA) ENERGY STAR Most Efficient 2019 Proposed Criteria, Central Air Conditioners, Heat Pumps and Geothermal Heat Pumps* as published on June 30, 2018.

Lennox is a leading provider of climate-control solutions for heating, air conditioning, and refrigeration markets. Lennox is a publicly-traded company that has thousands of employees, and it manufactures equipment addressed by the EPA ENERGY STAR proposed criteria. Lennox appreciates the opportunity to work with EPA to develop reasonable, practical energy efficiency specifications and programs that further EPA's energy efficiency objectives.

Lennox offers the following comments on the Proposed Criteria.

A. *General Comments.*

Lennox believes there is significant benefit to the EPA ENERGY STAR program as a forum that can be used by stakeholders to promote increased energy efficiency. This is accomplished by setting reasonable specification for energy performance criteria that also consider impacts to consumers, contractors, distributors and manufacturer's.

B. *Specific Issues regarding the Proposed Criteria.*

Lennox supports the EPA ENERGY STAR Most Efficient Proposed Criteria with one significant exception. For Ducted and Ductless Central Air Conditioners and Heat Pumps; EPA is proposing to require variable capacity performance for 2019 while maintaining the current cooling and heating performance levels. Lennox strongly opposes this additional prescriptive requirement as it will eliminate products that are well beyond the minimum performance requirements and deviate from the Consortium for Energy Efficiency (CEE) Tier 3 levels. Lennox finds having one set of specifications that can be promoted by all efficiency programs in the US and Canada makes it easier for contractors, distributors, and manufacturers to engage and hence allows for a larger impact on the market.

Lennox offers some of the most efficient variable capacity products on the market and supports further adoption of variable capacity products but finds prescriptive standards which chose technologies rather than relying on performance metrics to drive product innovation to the most effective solution to be counterproductive. This proposal would eliminate key Lennox products which are listed as ENERGY STAR Most Efficient 2018 products and far exceed the 2019 Most Efficient performance requirements. The EPA should base the primary criteria on the federally mandated energy efficiency metrics for these products and avoid additional prescriptive requirement which can limit potential future innovation.

In conclusion, Lennox recommends that the EPA remove this requirement from the 2019 Most Efficient Proposed Criteria. Lennox appreciates the opportunity to provide these comments and looks forward to a continuing to work with EPA on this issue. Please feel free to contact us with any further questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "David W. Wainwright".

David Wainwright
Sr. Engineering Manager, Regulatory Affairs
803-738-4085