

Please accept these comments on the ENERGY STAR Light Commercial HVAC Version 3.0 Draft 1.

1. Support the ENERGY STAR proposed efficiency levels for light commercial HVAC > 65,000 Btu/hr in line with DOE Federal minimums for 2023. This provides consistency in the market and supports market movement toward the 2023 standard. The Advanced RTU Campaign has made great progress in working with market leaders in adopting high-efficiency rooftop units and showing that they can be cost effective. Increasing the ENERGY STAR efficiency levels will support a broader market adoption of these high efficiency measures.
2. Support the inclusion of EER and IEER metrics. IEER is the most important metric for annual energy performance, and EER is important for peak load performance and understanding peak demand impacts.
3. Highly recommend including units < 65,000 Btu/hr in the new ENERGY STAR efficiency levels because they represent a very large part of the market for commercial AC units. Even if the growth in this sector is small, they still represent a larger market share than the bigger units by number (maybe not by energy consumption). Recommend re-evaluating the cost performance for these smaller units. The estimated savings for higher SEER values are very small and do not agree with whole building savings calculations completed for other projects that I have completed.

Thank you
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