

September 8, 2015

Ms. Abigail Daken  
ENERGY STAR HVAC Program  
U.S. EPA Headquarters  
William Jefferson Clinton Building  
1200 Pennsylvania Avenue NW  
Mail Code:6202A  
Washington, DC 20460  
[daken.abigail@epa.gov](mailto:daken.abigail@epa.gov)  
[mostefficient@energystar.gov](mailto:mostefficient@energystar.gov)

Dear Ms. Daken:

As an ENERGY STAR award recipient the past seven years, Panasonic is proud to actively support the ENERGY STAR program initiatives including the ENERGY STAR Most Efficient designation earned by the top performing products in the market.

- We recognize the desire on ENERGY STAR's part to have the Most Efficient Category as an award for only the top performers on an annual basis. However, we believe there may be an inconsistency for multispeed fans to meet the 10 CFM/W limit at only the top speed. A few fans will meet the top speed, but fail the 10 CFM/W at lower speeds.
- It is Panasonic's experience that most multispeed fans are set to run continuously, or intermittently, at lower speeds to meet ASHRAE 62.2 Ventilation Standards. Therefore, anecdotally, it would seem to be appropriate to have some sort of 'blended' standard or possibly a similar standard to meet CFM/W at high, medium and low speeds or at the 40% - 60% of the maximum speed in order to reflect the way multispeed fans are used in the market.
- Finally, we have proposed requiring Most Efficient Ventilation Fans report some levels at 0.25 W.G. This was something ENERGY STAR proposed to HVI many years ago but was determined too onerous for the initial ENERGY STAR standard. Panasonic believes that consumers would be interested in noise levels at anticipated installation levels. ASHRAE recognizes 0.25 W.G. to reflect actual installation static pressure so requiring Vent Fan Manufacturers to report some levels for the Most Efficient Category should not be a major issue.

Thank you for the opportunity to comment on EPA's ENERGY STAR Most Efficient 2016.

Sincerely,

Mark Sharp  
Group Manager

cc: Jim Shelton  
Ted Cater  
Don Stevens