



1111 19th Street NW > Suite 402 > Washington, DC 20036
t 202.872.5955 f 202.872.9354 www.aham.org

February 13, 2015

Via E-Mail

Melissa Fiffer
Product Manager
U.S. Environmental Protection Agency
ENERGY STAR Appliance Program
appliances@energystar.gov

Re: AHAM Comments, ENERGY STAR Program Requirements
Product Specification for Room Air Conditioners, Eligibility Criteria,
Final Draft, Version 4.0

Dear Ms. Fiffer:

On behalf of the Association of Home Appliance Manufacturers (AHAM), I would like to provide our comments on the ENERGY STAR Product Specification for Room Air Conditioners, Eligibility Criteria, Final Draft, Version 4.0.

AHAM represents manufacturers of major, portable and floor care home appliances, and suppliers to the industry. AHAM's membership includes over 150 companies throughout the world. In the U.S., AHAM members employ tens of thousands of people and produce more than 95% of the household appliances shipped for sale. The factory shipment value of these products is more than \$30 billion annually. The home appliance industry, through its products and innovation, is essential to U.S. consumer lifestyle, health, safety and convenience. Through its technology, employees and productivity, the industry contributes significantly to U.S. jobs and economic security. Home appliances also are a success story in terms of energy efficiency and environmental protection. New appliances often represent the most effective choice a consumer can make to reduce home energy use and costs.

AHAM supports EPA and the Department of Energy (DOE) in their efforts to provide incentives to manufacturers, retailers, and consumers for continual energy efficiency improvement, as long as product performance can be maintained for the consumer. AHAM appreciates EPA's understanding of our concerns regarding the previous draft's requirements regarding installation materials and sound performance, and thanks the Agency for removing those requirements from the current draft. Nevertheless, we continue to be concerned about EPA's proposed approach regarding alternative refrigerants and the specification's effective date.

I. Alternative Refrigerants

In comments to the November 2013 Version 4.0 framework document, AHAM noted that refrigerants in room air conditioners (RACs) are very different than those in refrigerator/freezers—the charge amounts in room air conditioners are much higher. Safety issues are different, and the refrigerant heat transfer dynamics are different. There are also additional increased safety requirements for storage, transport, manufacture of such materials that the analysis cited does not appear to have considered. Those same reports are not specific to RACs and represent a broad statement on refrigerants and hydrocarbons. The low-GWP alternative refrigerants, such as hydrocarbons or HFOs, that exist for refrigeration products may not be feasible for room air conditioners.

Hydrocarbons have not been Significant New Alternatives Policy Program (SNAP) approved for RACs. EPA is premature in considering alternative refrigerants in the ENERGY STAR program until a suite of options has been approved under SNAP. In addition, Underwriters Laboratory (UL) is looking at this issue from a safety perspective and could place restrictions on charge size. It is possible that the necessary charge to operate most room air conditioners may not fit within the range UL establishes. In addition, significant technical and economic challenges to using alternative refrigerant remain—refrigerant choice has a demonstrable impact on RAC design. Accordingly, AHAM does not believe that there are low GWP alternatives available that are economically justified at this time.

Furthermore, as we have commented in the past, EPA must not stray from its strategic vision for the ENERGY STAR program, which is to reduce greenhouse gas emissions by removing barriers in the market that deter consumers and others from purchasing the most energy-efficient product model that otherwise meets their needs. In fact, the ENERGY STAR program was authorized by 42 U.S.C. § 6294(a) “to identify energy efficient products”—nothing else. The ENERGY STAR program must remain squarely focused on energy efficiency and should not create design requirements. Market forces should and will dictate whether manufacturers decide to incorporate such design elements into their products.

II. Effective Date

As EPA has recognized in the past, fall is the appropriate transition time for changes in the RAC ENERGY STAR specification so that units can be certified for the following spring and summer seasons. RACs are a seasonal product—planning and production occur at specified times during the year. The timing of EPA’s proposal will not allow enough time to complete the planning process in advance of the selling season. As stated earlier, there are limited product testing chambers available for third party certification and they are already running at high capacity. Because of development time and the time required for certification, AHAM believes that Version 4.0 should go into effect in the fall of 2016.

AHAM appreciates the opportunity to submit comments on the ENERGY STAR Product Specification for Residential Dishwashers, Eligibility Criteria, Final Draft, Version 4.0 and would be glad to further discuss these matters should you so request.

Best Regards,

A handwritten signature in black ink that reads "Jennifer Cleary". The signature is written in a cursive style with a large, looping initial "J".

Jennifer Cleary
Director, Regulatory Affairs