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November 19, 2020

Ms. Abigail Daken
Manager, ENERGY STAR HVAC Program
United States Environmental Protection Agency
Washington, DC 20460
(Sent via email to CAC-ASHP@energystar.gov)

Re: AHRI-HRAI Comments to ENERGY STAR® Final Draft Version 6.0 Central Air Conditioner and Heat Pump (CAC/HP) Specification

Dear Ms. Daken,

The Air-Conditioning, Heating, and Refrigeration Institute (AHRI) and the Heating, Refrigeration and Air Conditioning Institute of Canada (HRAI) (collectively, the "Joint Commenters") are submitting these comments in response to the United States Environmental Protection Agency (EPA) ENERGY STAR® Final Draft Version 6.0 Central Air Conditioner and Heat Pump (CAC/HP) Specification, issued on October 22, 2020.

For more than 30 years, industry has supported the ENERGY STAR program for residential air conditioners and heat pumps. Consumers and utilities alike have benefited from the market shift to higher efficiency products enabled by a trusted, recognized program; however, as the Joint Commenters have expressed in the three previous drafts, industry can no longer support the program. The numerous prescriptive requirements included in the Final Draft 2 will dramatically narrow qualifying products with stringent levels and prescriptive requirements so burdensome that only the top-of-the-line products would meet the specification. It is unlikely that AHRI will continue as a certification body for CAC/HP if Version 6.0 is implemented as outlined in the Final Draft.

Manufacturers would like to continue supporting a program rooted in the ENERGY STAR's Strategic Vision and Guiding Principles.¹ However, no data has been presented to suggest sufficient energy is not being saved by an ENERGY STAR program based solely on efficiency, and optional connected criteria, to warrant such extensive changes in the main ENERGY STAR

¹ ENERGY STAR® Products Program Strategic Vision and Guiding Principles, May 2012,
https://www.energystar.gov/ia/partners/prod_development/downloads/ENERGY_STAR_Strategic_Vision_and_Guiding_Principles.pdf?0a0a-3f14

program. There are both ducted and ductless CAC/HP included in this Specification. Both product categories are necessary to serve the residential space conditioning market.

The current program, predicated on meeting reasonable performance requirements that consumers can afford, is successful. If prescriptive requirements and additional test requirements are not modified or removed as recommended in comments to previous drafts, the Joint Commenters are left to stand by the recommendation of sunseting the program before changes go into effect. We reiterate that only a small percentage (low single digit) of products offered today would meet the levels and prescriptive requirements presented in this Final Draft Specification. Conversely, continuing a performance-based program, with connected criteria harmonized completely with AHRI 1380, as optional will ensure a program that recognizes energy-saving products as intended by the ENERGY STAR program.

Should EPA decide to move forward with a program that could be supported by manufacturers, the Joint Commentors note there are two corrections related to ensure that the connected criteria fully harmonize with AHRI 1380. First, the reporting of Operational States was removed from the OpenADR requirements. The definitions for the Operational States exist in Section 6.1.2.2; however, no reports are required to be made in OpenADR. Second, the Joint Commenters note that the Final Draft requires the transmission of measured or estimated instantaneous power draw in current conditions; however, the reporting of power draw was removed from the final, published edition of AHRI 1380. The Joint Commenters support full harmonization with AHRI 1380 and request that EPA update the Final Draft Specifications to remove operational state and power draw reporting.

Lastly, the mandate of certifying all ENERGY STAR products to M1 metrics beginning January 1, 2022 will unfairly penalize certain currently qualified high efficiency products that may be manufactured only until December 31, 2022, with production ceasing due to product line changes. These products would not be rated to the M1 test procedure. If the specifications transition to Version 6.0 as proposed, these products would be unavailable to consumers despite being highly efficient. Therefore, AHRI urges EPA to adopt January 1, 2023 as the effective date for mandatory change from Appendix M (SEER/EER/HSPF) to M1 (SEER2/EER2/HSPF2).

The Joint Commenters recommend EPA make the significant revisions we have suggested in previous comments to maintain an effective program that aligns with the program's Guiding Principles, or sunset the program on December 31, 2022.

We appreciate the opportunity to provide these comments and look forward to reviewing a third draft. If you have any questions regarding this submission, please do not hesitate to contact Laura Petrillo-Groh, lpetrillo-groh@ahrinet.org.

Sincerely,



Sandy MacLeod



Laura Petrillo-Groh

HRAI
President and CEO

AHRI
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cc: C. Davidson-Hood, AHRI
M. Luymes, HRAI
H. Walter-Terrinoni, AHRI