



Jason Thomas

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February 23, 2020

Ms. Abigail Daken
Manager, Energy Star® HVAC Program
U.S. EPA
Washington DC, 20460
(Sent via email to: cacashp@energystar.gov)

RE: Proposed Amendment to the Installation Criteria

Dear Ms. Daken,

Carrier provides fire safety, security, building automation, heating, ventilation, air conditioning and refrigeration systems and services to promote integrated, high performance buildings that are safer, smarter and sustainable. Carrier is the founder of the modern HVAC industry and operates across the globe. Our range of products includes unitary residential and commercial products, including ducted and ductless, transport refrigeration products, chillers, and HVAC building services.

Carrier agrees with EPA's conclusion that b, c, e, and f of the installation capability requirements in this specification require two-way communication, and therefore reduces the number of products available on the market. However, we disagree with the proposed solution to make the installation capability requirement only applicable to equipment with three or more capacities (referred to as multi-capacity in the remainder of this letter). The result would be that multi-capacity systems, which are generally more efficient and more expensive, would have additional requirements without an Energy Star market differentiation. This proposed amendment does not create an incentive for consumers to purchase higher efficient equipment.

Additionally, two-way communication is not necessary for multi-capacity equipment. Implementing this proposal could lead to a single or two stage system being Energy Star certified, while a higher efficient multi-capacity system is not. This would create confusion among contractors and homeowners like that which exists today with Energy Star Connected Thermostats and non-certified communicating controllers. This proposed amendment does not create a common, objective basis for defining high efficiency products.

For these reasons, Carrier is opposed to the proposed amendment. We maintain the position outlined in our prior comments. The installation requirements should remain in the Most Efficient category for all products. Carrier appreciates the opportunity to provide these



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comments. If you have any questions regarding this submission, or wish to discuss further, please do not hesitate to contact me.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Jason Thomas".

Jason Thomas
Director, Regulatory Affairs
Carrier