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November 23, 2021

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

**RE: Carrier Comments on Draft Revision 6.1 of ENERGY STAR® Program Requirements Product Specification for Central Air Conditioner and Heat Pump Equipment**

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 more 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 appreciates EPA's consideration of the additional feedback to Version 6.0 requirements. Carrier is a long-time supporter of the Energy Star® program and is committed to working with EPA to ensure the program is successful in identifying and promoting highly efficient product to reduce greenhouse gas emissions. In comments during the development of Version 6.0, Carrier expressed a concern regarding the limited number of products that would meet the criteria, and therefore supports EPA making modifications. Carrier supports lowering the EER requirements for multi-capacity air conditioners and heat pumps and removing the EER requirements and reducing the HSPF requirements for ducted cold climate heat pumps. Carrier does not support the proposed revisions to the installation requirements and requests EPA to consider the points included in these comments when finalizing Version 6.1 requirements. Additionally, Carrier requests EPA maintain an effective date of January 1, 2022 rather than shifting the effective date to January 1, 2023.

**EPA should remove installation criteria from the program requirements.**

In prior comments Carrier suggested the installation criteria should remain in the Most Efficient criteria and not be included in Version 6.0 because only a small percentage of ducted product, and virtually no ductless product, met the criteria. Additionally, making this requirement only for variable speed product could create confusion in the market among contractors and consumers. Lower efficient single and two stage products would be Energy Star listed, while



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higher efficient variable speed product would not. This would likely cause consumers to purchase lower efficiency equipment because of the financial incentive, as well as the misconception the equipment was more efficient.

It is Carrier's view the modifications to the installation criteria in draft Version 6.1 do not solve these issues. Updating the requirement so that variable speed mini-splits and multi-splits are only required to have two of the capabilities versus three does not expand the number of these products available. Mini-splits and multi-splits are important products to meet decarbonization goals, and it is Carrier's view the updated requirement will not incentivize their use. Additionally, the proposed modifications do not address the issue of limited compliant ducted variable speed products, which is also important for decarbonization. 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.

**The effective date should remain January 1, 2022 for new products introduced.**

Carrier appreciates EPA proposing an effective date of January 1, 2023. Typically, manufacturers need time to react to changes in specifications. However, this is a unique situation. Manufacturers will be releasing their products for the test procedure and minimum efficiency change in 2022. A January 1, 2023 effective date may, in fact, create complications for manufacturers and confusion in the market. Carrier suggest keeping the January 1, 2022 effective date.

Thank you for consideration of this input. Again, Carrier supports the Energy Star® program and shares this input for the purposes of helping EPA maintain a strong program that incentivizes consumers to choose efficient products. 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