



ENERGY STAR® Program Requirements for Light Commercial HVAC

Partner Commitments

Following are the terms of the ENERGY STAR Partnership Agreement as it pertains to the manufacture and labeling of ENERGY STAR qualified products. The ENERGY STAR Partner must adhere to the following partner commitments:

Certifying Products

1. Comply with current ENERGY STAR Eligibility Criteria, which define performance requirements and test procedures for Light Commercial HVAC equipment. A list of eligible products and their corresponding Eligibility Criteria can be found at www.energystar.gov/specifications.
2. Prior to associating the ENERGY STAR name or mark with any product, obtain written certification of ENERGY STAR qualification from a Certification Body recognized by EPA for Light Commercial HVAC equipment. As part of this certification process, products must be tested in a laboratory recognized by EPA to perform Light Commercial HVAC testing. A list of EPA-recognized laboratories and certification bodies can be found at www.energystar.gov/testingandverification.

Using the ENERGY STAR Name and Marks

3. Comply with current ENERGY STAR Brand Book, which defines how the ENERGY STAR name and marks may be used. Partner is responsible for adhering to these guidelines and ensuring that its authorized representatives, such as advertising agencies, dealers, and distributors, are also in compliance. The ENERGY STAR Brand Book is available at www.energystar.gov/logouse.
4. Use the ENERGY STAR name and marks only in association with qualified products. Partner may not refer to itself as an ENERGY STAR Partner unless at least one product is qualified and offered for sale in the U.S. and/or ENERGY STAR partner countries.
5. Provide clear and consistent labeling of ENERGY STAR qualified Light Commercial HVAC equipment.
 - 5.1. The ENERGY STAR mark must be clearly displayed in product literature (i.e., user manuals, spec sheets, etc.), and on the manufacturer's Internet site where information about ENERGY STAR qualified models is displayed.
 - 5.2. It is also recommended that the mark appear on the product packaging and on the top/front of the product.

Verifying Ongoing Product Qualification

6. Participate in third-party verification testing through a Certification Body recognized by EPA for Light Commercial HVAC equipment, providing full cooperation and timely responses. EPA/DOE may also, at its discretion, conduct tests on products that are referred to as ENERGY STAR certified. These products may be obtained on the open market, or voluntarily supplied by Partner at the government's request.

Providing Information to EPA

7. Provide unit shipment data or other market indicators to EPA annually to assist with creation of ENERGY STAR market penetration estimates, as follows:
 - 7.1. Partner must submit the total number of ENERGY STAR qualified Light Commercial HVAC units shipped in the calendar year or an equivalent measurement as agreed to in advance by EPA and Partner. Partner shall exclude shipments to organizations that rebrand and resell the shipments (unaffiliated private labelers).
 - 7.2. Partner must provide unit shipment data segmented by meaningful product characteristics (e.g., type, capacity, presence of additional functions) as prescribed by EPA.
 - 7.3. Partner must submit unit shipment data for each calendar year to EPA or an EPA-authorized third party, preferably in electronic format, no later than March 1 of the following year.

Submitted unit shipment data will be used by EPA only for program evaluation purposes and will be closely controlled. If requested under the Freedom of Information Act (FOIA), EPA will argue that the data is exempt. Any information used will be masked by EPA so as to protect the confidentiality of the Partner.
8. Report to EPA any attempts by recognized laboratories or Certification Bodies (CBs) to influence testing or certification results or to engage in discriminatory practices.
9. Notify EPA of a change in the designated responsible party or contacts within 30 days using the My ENERGY STAR Account tool (MESA) available at www.energystar.gov/mesa.

Training and Consumer Education

10. Partner shall comply with the following, product-specific requirements concerning training and education:
 - 10.1. Offer and encourage training to distributors and/or contractors on the following issues: air distribution issues and their effect on equipment performance, refrigerant charging, proper installation of registers, duct work, and plenum to ensure low leakage and to meet insulation requirements, and proper use of the Manual N calculation, or other equivalent commercial load calculation, in order to encourage proper sizing of equipment.

Performance for Special Distinction

In order to receive additional recognition and/or support from EPA for its efforts within the Partnership, the ENERGY STAR Partner may consider the following voluntary measures, and should keep EPA informed on the progress of these efforts:

- Provide quarterly, written updates to EPA as to the efforts undertaken by Partner to increase availability of ENERGY STAR qualified products, and to promote awareness of ENERGY STAR and its message.
- Consider energy efficiency improvements in company facilities and pursue benchmarking buildings through the ENERGY STAR Buildings program.
- Purchase ENERGY STAR qualified products. Revise the company purchasing or procurement specifications to include ENERGY STAR. Provide procurement officials' contact information to EPA for periodic updates and coordination. Circulate general ENERGY STAR qualified product information to employees for use when purchasing products for their homes.
- Feature the ENERGY STAR mark(s) on Partner website and other promotional materials. If information concerning ENERGY STAR is provided on the Partner website as specified by the ENERGY STAR Web Linking Policy (available in the Partner Resources section of the ENERGY STAR website), EPA may provide links where appropriate to the Partner website.

- Ensure the power management feature is enabled on all ENERGY STAR qualified displays and computers in use in company facilities, particularly upon installation and after service is performed.
- Provide general information about the ENERGY STAR program to employees whose jobs are relevant to the development, marketing, sales, and service of current ENERGY STAR qualified products.
- Provide a simple plan to EPA outlining specific measures Partner plans to undertake beyond the program requirements listed above. By doing so, EPA may be able to coordinate and communicate Partner's activities, provide an EPA representative, or include news about the event in the ENERGY STAR newsletter, on the ENERGY STAR website, etc. The plan may be as simple as providing a list of planned activities or milestones of which Partner would like EPA to be aware. For example, activities may include: (1) increasing the availability of ENERGY STAR qualified products by converting the entire product line within two years to meet ENERGY STAR guidelines; (2) demonstrating the economic and environmental benefits of energy efficiency through special in-store displays twice a year; (3) providing information to users (via the website and user's manual) about energy-saving features and operating characteristics of ENERGY STAR qualified products; and (4) building awareness of the ENERGY STAR Partnership and brand identity by collaborating with EPA on one print advertorial and one live press event.
- Join EPA's SmartWay Transport Partnership to improve the environmental performance of the company's shipping operations. The SmartWay Transport Partnership works with freight carriers, shippers, and other stakeholders in the goods movement industry to reduce fuel consumption, greenhouse gases, and air pollution. For more information on SmartWay, visit www.epa.gov/smartway.
- Join EPA's Green Power Partnership. EPA's Green Power Partnership encourages organizations to buy green power as a way to reduce the environmental impacts associated with traditional fossil fuel-based electricity use. The partnership includes a diverse set of organizations including Fortune 500 companies, small and medium businesses, government institutions as well as a growing number of colleges and universities. For more information on Green Power, visit www.epa.gov/greenpower.



ENERGY STAR® Program Requirements Product Specification for Light Commercial HVAC

Eligibility Criteria Version 4.0 Rev. April 2022

Following is the Final Version 4.0 ENERGY STAR product specification for light commercial HVAC equipment. A product shall meet all of the identified criteria if it is to earn the ENERGY STAR.

1) Definitions: Below are the definitions of the relevant terms in this document.

- A. Commercial Package Air-Conditioning and Heating Equipment¹: Electrically operated, unitary central air conditioners and central air-conditioning heat pumps used for commercial applications. Small commercial package air-conditioning and heating equipment is rated below 135,000 Btu/h cooling capacity. Large commercial package air-conditioning and heating equipment is rated at or above 135,000 Btu/h and below 240,000 Btu/h cooling capacity.
 - a) Commercial Unitary Air Conditioner (CUAC): An air conditioner model consists of one or more factory-made assemblies that normally include an evaporator or cooling coil(s), compressor(s), and condenser(s). Air conditioners provide the function of air cooling, and may include the functions of air circulation, air cleaning, dehumidifying, or humidifying.
 - b) Commercial Unitary Heat Pump (CUHP): A heat pump model consists of one or more factory-made assemblies that normally include an indoor conditioning coil(s), compressor(s), and outdoor coil(s), including means to provide a heating function. Heat pumps shall provide the function of air heating with controlled temperature, and may include the functions of air cooling, air circulation, air cleaning, dehumidifying, or humidifying.
- B. Gas/Electric Package Unit: Commercial package air-conditioning and heating equipment with gas heating that is often installed on a slab or a roof.
- C. Variable Refrigerant Flow Multi-Split (VRF) Air Conditioner¹: A unit of commercial package air-conditioning and heating equipment that is configured as a split system air conditioner incorporating a single refrigerant circuit, with one or more outdoor units, at least one variable-speed compressor or an alternate compressor combination for varying the capacity of the system by three or more steps, and multiple indoor fan coil units, each of which is individually metered and individually controlled by an integral control device and common communications network and which can operate independently in response to multiple indoor thermostats. Variable refrigerant flow implies three or more steps of capacity control on common, inter-connecting piping.

¹ Based on 10 CFR part 431, Subpart F §431.92. In case of conflict, the CFR shall be taken as authoritative.

- D. Variable Refrigerant Flow Multi-Split (VRF) Heat Pump¹: A unit of commercial package air-conditioning and heating equipment that is configured as a split system heat pump that uses reverse cycle refrigeration as its primary heating source and which may include secondary supplemental heating by means of electrical resistance, steam, hot water, or gas. The equipment incorporates a single refrigerant circuit, with one or more outdoor units, at least one variable-speed compressor or an alternate compressor combination for varying the capacity of the system by three or more steps, and multiple indoor fan coil units, each of which is individually metered and individually controlled by a control device and common communications network, and which can operate independently in response to multiple indoor thermostats. Variable refrigerant flow implies three or more steps of capacity control on common, inter-connecting piping.
- E. Basic Model¹:
- a) Commercial Package Air-Conditioning and Heating Equipment: All units manufactured by one manufacturer within a single equipment class, having the same or comparably performing compressor(s), heat exchangers, and air moving system(s) that have a common “nominal” cooling capacity.
 - b) Variable Refrigerant Flow Multi-Split: All units manufactured by one manufacturer within a single equipment class, having the same primary energy source (e.g., electric or gas), and which have the same or comparably performing compressor(s) that have a common “nominal” cooling capacity and the same heat rejection medium (e.g., air or water).
- F. Energy Efficiency Ratio (EER)¹: The ratio of the average rate of space cooling delivered to the average rate of electrical energy consumed by the air conditioner or heat pump. This ratio is expressed in Btu per Wh (Btu/Wh). The represented value of EER is determined via the test methods prescribed at 10 CFR Part 431, Subpart F, §431.96, Table 1. For very small equipment covered in this specification, the represented value may alternatively be EER₂ measured per the proposed Appendix B1 to 10 CFR Part 431, Subpart F.
- G. Coefficient of Performance (COP)¹: The ratio of the average rate of space heating delivered to the average rate of electrical energy consumed by the heat pump. These rate quantities must be determined from a single test or, if derived via interpolation, must be determined at a single set of operating conditions. COP is a dimensionless quantity.
- H. Integrated Energy Efficiency Ratio (IEER)¹: A weighted average calculation of mechanical cooling EERs determined for four load levels and corresponding rating conditions, expressed in Btu/watt-hour, as measured in Appendix A of Subpart F of 10 CFR part 431 for CUACs and CUHPs or Table 1 of §431.96 of Subpart F of 10 CFR Part 431 for VRFs.
- I. Heating Seasonal Performance Factor (HSPF)¹: The total space heating required in region IV during the space heating season, expressed in Btu, divided by the total electrical energy consumed by the heat pump system during the same season, expressed in watt-hours. The represented value of HSPF is determined via the test methods prescribed at 10 CFR Part 431, Subpart F, §431.96, Table 1. The represented value may alternatively be HSPF₂ measured per the proposed Appendix B1 to 10 CFR Part 431, Subpart F.
- J. Seasonal Energy Efficiency Ratio (SEER)¹: The total heat removed from the conditioned space during the annual cooling season, expressed in Btu, divided by the total electrical energy consumed by the air conditioner or heat pump during the same season, expressed in watt-hours. The represented value of SEER is determined via the test methods prescribed at 10 CFR Part 431, Subpart F, §431.96, Table 1. The represented value may alternatively be SEER₂ measured per the proposed Appendix B1 to 10 CFR Part 431, Subpart F.

2) Scope:

- A. Included Products: Air-cooled, three-phase, split system (i.e., any CUAC or CUHP in which one or more of the major assemblies are separate from the others) and single package (i.e., any CUAC or CUHP in which all the major assemblies are enclosed in one cabinet) central air conditioners, heat pumps, gas/electric package units, and variable refrigerant flow (VRF) multi-split systems with capacity rated to be below 240,000 Btu/h that meet the definitions specified herein are eligible for ENERGY STAR certification, with the exception of products listed in Section 2.B.
- B. Excluded Products: Water-cooled, evaporatively-cooled, and water source commercial products are not eligible under this specification. Products covered by other ENERGY STAR specifications are not eligible under this specification. Note that single-phase products below 65,000 Btu/h may be certified as ENERGY STAR under the CAC/ASHP specification.

3) Certification Criteria:

A. Energy Efficiency Requirements:

a. Certification Metric Criteria

Table 1: Criteria for ENERGY STAR Certified CUACs

Equipment Type	Cooling Capacity	Heating Section Type	Minimum Energy Efficiency Criteria
Very Small CUAC (Single Package)	< 65,000 Btu/h	All	16.0 SEER; 12.0 EER OR 15.2 SEER2; 11.5 EER2
Very Small CUAC (Split System)	< 65,000 Btu/h	All	16.0 SEER; 12.5 EER OR 15.2 SEER2; 12.0 EER2
Small CUAC	≥ 65,000 Btu/h – < 135,000 Btu/h	Electric Resistance (or None)	12.7 EER; 18.0 IEER
		All other	12.5 EER; 17.8 IEER
Large CUAC	≥ 135,000 Btu/h – < 240,000 Btu/h	Electric Resistance (or None)	12.2 EER; 17.0 IEER
		All other	12.0 EER; 16.8 IEER

Table 2: Criteria for ENERGY STAR Certified CUHPs

Equipment Type	Cooling Capacity	Heating Section Type	Minimum Energy Efficiency Criteria
Very Small CUHP (Single Package)	< 65,000 Btu/h	All	16.0 SEER; 11.0 EER; 8.5 HSPF OR 15.2 SEER2; 10.6 EER2; 7.2 HSPF2
Very Small CUHP (Split System)	< 65,000 Btu/h	All	16.0 SEER; 12.1 EER; 9.2 HSPF OR 15.2 SEER2; 11.7 EER2; 7.8 HSPF2
Small CUHP	≥ 65,000 Btu/h – < 135,000 Btu/h	Electric Resistance (or None)	11.8 EER; 15.3 IEER; 3.5 COP at 47°F; 2.4 COP at 17°F
		All other	11.6 EER; 15.1 IEER; 3.5 COP at 47°F; 2.4 COP at 17°F
Large CUHP	≥ 135,000 Btu/h – < 240,000 Btu/h	Electric Resistance (or None)	11.1 EER; 14.5 IEER; 3.4 COP at 47°F; 2.1 COP at 17°F
		All other	10.9 EER; 14.3 IEER; 3.4 COP at 47°F; 2.1 COP at 17°F

Table 3: Criteria for ENERGY STAR Certified Light Commercial VRF Multi-Split Systems*

Equipment Type	Cooling Capacity	Heating Section Type	Minimum Energy Efficiency Criteria
Very Small VRF Air-Cooled Air Conditioner	< 65,000 Btu/h	All	16.0 SEER; 12.5 EER OR 15.2 SEER2; 12.0 EER2
Small VRF Air-Cooled Air Conditioner	≥ 65,000 Btu/h – < 135,000 Btu/h	All	12.0 EER; 17.4 IEER
Large VRF Air-Cooled Air Conditioner	≥ 135,000 Btu/h – < 240,000 Btu/h	All	11.3 EER; 16.4 IEER
Very Small VRF Air-Cooled Heat Pump	< 65,000 Btu/h	All	16.0 SEER; 12.1 EER; 9.2 HSPF OR 15.2 SEER2; 11.7 EER2; 7.8 HSPF2
Small VRF Air-Cooled Heat Pump	≥ 65,000 Btu/h – < 135,000 Btu/h	Without Heat Recovery	11.8 EER; 17.4 IEER; 3.4 COP at 47°F
		With Heat Recovery	11.6 EER; 17.2 IEER; 3.4 COP at 47°F

Equipment Type	Cooling Capacity	Heating Section Type	Minimum Energy Efficiency Criteria
Large VRF Air-Cooled Heat Pump	≥ 135,000 Btu/h – < 240,000 Btu/h	Without Heat Recovery	10.9 EER; 16.4 IEER; 3.25 COP at 47°F
		With Heat Recovery	10.7 EER; 16.2 IEER; 3.25 COP at 47°F

* VRF models must meet these requirements in ducted, ductless, and mixed configurations to be certified.

B. Cold Climate Heat Pumps: For purposes of ENERGY STAR certification, a Heat Pump model may be designated as Cold Climate if it meets the following:

a. Certification Metric Criteria

Table 4: Energy-Efficiency Criteria for Certified Cold Climate Light Commercial Heat Pumps*

Equipment Type	Cooling Capacity	Minimum Energy Efficiency Criteria
Very Small CUHP (Single Package)**	< 65,000 Btu/h	16.0 SEER; 9.5 HSPF OR 15.2 SEER2; 8.1 HSPF2
Very Small CUHP (Split System)**	< 65,000 Btu/h	16.0 SEER; 9.5 HSPF OR 15.2 SEER2; 8.1 HSPF2
Small CUHP	≥ 65,000 Btu/h – < 135,000 Btu/h	TBD
Large CUHP	≥ 135,000 Btu/h – < 240,000 Btu/h	TBD
Very Small VRF Air-Cooled Heat Pump**	< 65,000 Btu/h	16.0 SEER; 9.5 HSPF OR 15.2 SEER2; 8.1 HSPF2
Small VRF Air Cooled Heat Pump	≥ 65,000 Btu/h – < 135,000 Btu/h	18.9 IEER; 3.4 COP at 47°F; 2.25 COP at 17°F
Large VRF Air Cooled Heat Pump	≥ 135,000 Btu/h – < 240,000 Btu/h	18.0 IEER; 3.25 COP at 47°F; 2.07 COP at 17°F

* VRF models must meet these requirements in ducted, ductless, and mixed configurations to be certified.

** In addition to meeting these criteria, very small CUHP and VRF must demonstrate low ambient performance according to section 3.B.b. below.

b. Low Ambient performance for Very Small Cold Climate Heat Pumps: Heat pumps shall demonstrate low ambient performance through one of two paths.

i. Using Proposed Appendix B1 to 10 CFR part 431, Subpart F²:

² See 86 FR 70316, 70346-70347 (Dec. 9, 2021). EPA intends to update this specification to adopt the final regulation when the regulatory action is complete.

- COP at 5° F \geq 1.75, measured in accordance with the Appendix B1 H4_{Full} test.
- Percent of Heating Capacity at 5°F \geq 70% of that at 47°F, with the 5° F capacity measured per Appendix B1 H4_{Full} test and the 47°F capacity measured as the nominal heating capacity per Appendix B1 (i.e., from the Appendix B1 H1_N test for units having a variable-speed compressor where the compressor speed shall be the maximum speed that the system controls would operate at 47°F, otherwise from the Appendix B1 H1₂ test)
- Perform a controls verification procedure (CVP)³ to confirm that the above performance metrics measured at the Appendix B1 low ambient test point at 5° F are achieved by the native controls operating as they would in the field.

Models of very small heat pumps (i.e., commercial package heat pumps and VRF with cooling capacity <65,000 Btu/h) that are otherwise identical to central air conditioner and heat pump models (meaning differing only in phase of the electrical system and the phase of power input for which the motors and compressors are designed), may be recognized as cold climate if the corresponding single phase models are recognized as cold climate under the [ENERGY STAR Central Air Conditioner and Heat Pumps Version 6.1 specification](#).

- C. Gas/Electric Package Units: To certify for ENERGY STAR or ENERGY STAR Cold Climate, a gas/electric packaged unit shall meet the appropriate requirements in Tables 1, 2, 3, or 4, above. Additionally, it must provide at least 2 distinct stages of heating. The compressor heating in a heat pump may be considered one heating stage.
- D. Refrigerant Type Reporting Requirement: Manufacturers shall indicate the type of refrigerant(s) used in products as part of the ENERGY STAR certification process.
- E. Significant Digits and Rounding:
- All calculations shall be carried out with actual measured (unrounded) values.
 - Unless otherwise specified in this specification, compliance with specification limit shall be evaluated using directly measured or calculated values without any benefit from rounding.
 - COP shall be expressed in multiples of the nearest 0.01.
 - IEER shall be expressed in multiples of the nearest 0.1.
 - Capacity shall be expressed as mentioned in Table 5, below.

³ See [ENERGY STAR Cold Climate Heat Pump Controls Verification Procedure](#)

Table 5: Rounding Requirements for Capacity

Capacity Ratings, Btu/h	Multiples, Btu/h
65,000 up to 135,000	1,000
136,000 up to 400,000	2,000

4) Test Requirements:

- A. One of the following sampling plans shall be used for purposes of testing for ENERGY STAR certification:
- a. A single unit is selected, obtained, and tested. The measured performance of this unit and of each subsequent unit manufactured must be equal to or better than the ENERGY STAR specification requirements. Results of the tested unit may be used to certify additional individual model variations within a basic model as long as the definition for basic model provided in Section 1, above, is met; or
 - b. Units are selected for testing and results calculated according to the sampling requirements defined in 10 CFR part 429, Subpart B § 429.43. The certified rating must be equal to or better than the ENERGY STAR specification requirements. Results of the tested unit may be used to certify additional model variations within a basic model as long as the definition for basic model provided in Section 1, above, is met. Further, all individual models within a basic model must have the same certified rating based on the applicable sampling criteria. This rating must be used for all manufacturer literature, the qualified product list, and certification of compliance to DOE standards.
- B. When testing light commercial HVAC equipment, the following test method shall be used to determine ENERGY STAR certification. Note that several equipment types have two options for test method (and accompanying metrics), reflecting the changing landscape of Federally mandated test methods. Each model number should use the metrics associated with the test method it is certified with, and may recertify using the more up to date test method when needed.

Table 6: Test Method for ENERGY STAR Certification

System Type	Test Method Reference	ENERGY STAR Requirement
Very Small CUAC	10 CFR part 431, Subpart F, §431.96, Table 1	EER, SEER
	OR	
	Proposed Appendix B1 to 10 CFR part 431, Subpart F ¹	EER2, SEER2
Very Small CUHP	10 CFR part 431, Subpart F, §431.96, Table 1	EER, SEER, HSPF
	OR	
	Proposed Appendix B1 to 10 CFR part 431, Subpart F ¹	EER2, SEER2, HSPF2
Very Small VRF	10 CFR part 431, Subpart F, §431.96, Table 1	EER, SEER, HSPF
	OR	
	Proposed Appendix B1 to 10 CFR part 431, Subpart F ¹	EER2, SEER2, HSPF2

Very Small Cold Climate CUHP and VRF	Controls Verification Procedure for Residential Heat Pump Low Ambient Performance ²	Confirmation of 5 °F COP and capacity
Small and Large CUAC	10 CFR part 431, Subpart F, §431.96, Table 1	EER, IEER
Small and Large CUHP	10 CFR part 431, Subpart F, §431.96, Table 1	EER, IEER, COP at 47°F, COP at 17°F
Small and Large VRF	10 CFR part 431, Subpart F, §431.96, Table 1	EER, IEER, COP at 47°F, COP at 17°F

¹ See 86 FR 70316, 70346-70347 (Dec. 9, 2021). EPA intends to update this specification to adopt the final regulation when the regulatory action is complete

² See [ENERGY STAR Cold Climate Heat Pump Controls Verification Procedure](#)

5) Effective Date: The Light Commercial HVAC specification shall take effect on **January 1, 2023**. To be certified to ENERGY STAR, a product model shall meet the ENERGY STAR specification in effect on the model's date of manufacture. The date of manufacture is specific to each unit and is the date on which a unit is considered to be completely assembled.

6) Considerations for Future Revisions:

EPA reserves the right to change the specification should technological and/or market changes affect its usefulness to consumers, industry, or the environment. In keeping with current policy, revisions to the specification are arrived at through industry discussions. In the event of a specification revision, please note that the ENERGY STAR certification is not automatically granted for the life of a product model.

The following items are of interest to EPA and will be examined in future specification revisions.

- A. Updated Criteria for Light Commercial VRF Multi-Split Systems: The U.S. Department of Energy is currently reviewing the test method and standard applicable to the VRF equipment covered by the scope of this specification as part of their revision process. Once available, EPA intends to begin development of updated criteria for VRF products to complement the updated regulations.
- B. Cold Climate Performance: EPA seeks to further the recognition of high-efficiency products designed to operate in colder climates through the ENERGY STAR Cold Climate certification and intends to routinely update criteria to identify the top performing models in future specification development efforts. In particular, EPA will specify criteria for cold climate recognition of CUHPs between 65 and 240 kBtu/hr. To the extent that newly developed test procedures might offer a standardized way of measuring performance at very low ambient temperatures, EPA is likely to propose the introduction of reporting requirements for such.
- C. COP at 17F for VRF: It has been pointed out that while we have criteria for 17F COP for CUHP, we do not for VRF. EPA will consider adding these criteria to fully demonstrate the capability of VRF products, at levels not expected to present a challenge to VRF that meet the other ENERGY STAR criteria.
- D. Controls Verification Procedure (CVP): EPA intends to introduce a CVP for products with variable compressor speeds to confirm that performance metrics measured at low ambient temperature test points are achieved by a unit's native controls operating as they would in a customer's home.
- E. Scope Expansion: Stakeholders have requested two different scope expansions: VRF over 240 kBtu/hr and water source VRF. EPA will consider these requests.
- F. Automatic Fault Detection and Diagnostics: EPA understands that proper unit installation and

maintenance is critical in sustaining efficient performance and seeks to explore how specification criteria can promote self-detection and diagnostic capabilities in Light Commercial HVAC equipment.