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Ms. Abigail Daken
Manager, ENERGY STAR HVAC Program
United States Environmental Protection Agency
Washington, DC 20460

Submitted via e-mail: cacashp@energystar.gov

Re: EPA ENERGY STAR Residential Air Source Heat Pump (ASHP) and Central Air Conditioner (CAC) Equipment Version 6.0 Limited Topic Proposal on Installation Criteria.

Lennox International Inc. (Lennox) hereby submits comments on the *United States Environmental Protection Agency (EPA) ENERGY STAR Residential Air Source Heat Pump (ASHP) and Central Air Conditioner (CAC) Equipment Version 6.0 Limited Topic Proposal on Installation Criteria* as published by the EPA on January 26, 2021.

Lennox is a leading provider of climate-control solutions for heating, air conditioning, and refrigeration markets. Lennox is a publicly traded company that has thousands of employees, and it manufactures equipment addressed by the EPA ENERGY STAR ASHP and CAC program criteria.

A. General Comments.

Before commenting directly on the Limited Topic Proposal Lennox wishes to reiterate its position regarding ENERGY STAR 6.0 in general as detailed in prior comments submitted on November 19, 2020.

Lennox believes the EPA ENERGY STAR program can effectively promote increased energy efficiency. This can be accomplished by maintaining a program that is not burdensome to administer combined with *reasonable specifications for energy performance criteria that consider impacts to consumers, contractors, distributors and manufacturers*. Further, *the ENERGY STAR program should be nationally based* and work to unify energy program approaches across jurisdictions to increase the success of efficiency programs and avoid regional requirements which dilute program participation and effectiveness.

The proposed Final Draft Version 6.0 ASHP/CAC does not adequately address several issues raised by Lennox and the HVAC industry and presents significant problems to an industry overburdened with regulatory change. To ensure continued participation and success for the ENERGY STAR program Lennox urges that EPA revise Version 6.0 specification per the following:

- *ENERGY STAR performance criteria should be set at reasonable thresholds that average consumers can afford and aligned with ENERGY STAR's Guiding Principles.*

- *ENERGY STAR must not impose regional requirements.*
- *ENERGY STAR criteria should be performance based using DOE required metrics and test procedures.*
- *ENERGY STAR must avoid additional test requirements beyond those required by DOE including the Controls Verification Procedure.*
- *ENERGY STAR must avoid prescriptive requirements including the proposed Installation Criteria.*
- *AHRI 1380 should be the only requirement for optional connected criteria.*

Historically, when EPA overreaches by imposing burdensome ENERGY STAR requirements, participation in the program declines precipitously. Although Lennox produces many models that are rated as the most efficient ASHP and CAC products available in the market and supports the EPA ENERGY STAR efforts to recognize and promote highly efficient products, Lennox does not support the proposed Version 6.0 Final Draft specification or the proposed Installation Criteria. Due to limitations of the ENERGY STAR program value for CAC and HP products, the proposal will significantly reduce the products available that meet ENERGY STAR criteria and will not encourage manufacturer participation or market adoption.

B. Specific Issues regarding the Limited Topic Proposal on Installation Criteria

The EPA has proposed the following Amendment for ENERGY STAR 6.0 regarding Installation Criteria.

C. Installation Capabilities To certify as ENERGY STAR, all CAC/HPs that have three or more capacities, or are continuously variable, must be capable of providing at least three of the following capabilities to aid in quality installation. For purposes of this section, a thermostat or controller can be considered part of the system. Items a, b, and c are understood to be measured at maximum fan speed and capacity. Single-stage or two-stage CAC/HPs are exempt from this requirement but should report these features if they are available with some controllers.

Lennox understands EPA's proposal intention, and that it is largely based upon the current state of most variable speed products which have two-way communication integrated into those systems. While Lennox appreciates the exemption of this criteria for single and two stage products, Lennox does not support the proposed prescriptive Installation Criteria. The inclusion of this criteria for variable speed products will be an inhibitor to further innovation in variable speed technology by excluding products that may otherwise meet or exceed the ENERGY STAR 6.0 performance criteria as well as offer enhanced consumer benefits. Lennox strongly urges the EPA to remove this requirement and set performance criteria at reasonable thresholds that average consumer can afford aligned with ENERGY STAR's Guiding Principles to encourage manufacturer and market participation. This approach will promote cost-effective products that perform above baseline efficiency levels and provide energy savings to a broader base of consumers aligned with ENERGY STAR Guiding Principles.

The EPA should base the criteria for the ENERGY STAR ASHP and CAC specification criteria on the federally mandated energy efficiency metrics and test procedures for these products allowing manufacturers to find the most innovative and cost effective solution and avoid additional prescriptive requirements

The EPA must not impose both performance standards and a prescriptive “design requirements” on air-conditioning and heat pump equipment for the base ENERGY STAR program. Doing so is overly prescriptive, prevents manufacturers from meeting applicable performance standards in the most efficient way possible, and inhibits innovation. Moreover, it directly contradicts EPCA statutory provisions, which limit efficiency standards for a given product to a performance standard or a “design requirement.” (42 USC 6291(6)).

Even if Energy Star is voluntary, EPA should not now promulgate voluntary standards that are grossly inconsistent with the expressed will of Congress and the rulemaking of DOE. Lennox strongly recommends that the EPA remove the Installation Criteria prescriptive requirements or others considered from the specification. These requirements are currently included in the ENERGY STAR Most Efficient criteria where they may be appropriate and can be supported by Lennox.

Further, the additional reporting and potential verification requirements required to support the ENERGY STAR 6.0 proposal result in significantly increased burden that is not likely to be supported within the current industry program.

In conclusion, Lennox recommends that ENERGY STAR performance criteria be nationally based and set at reasonable thresholds that average consumers can afford. ENERGY STAR criteria should be performance based using DOE required metrics and test procedures and must avoid prescriptive requirements including the Installation Criteria proposed. Lennox remains engaged to further the effort of the EPA regarding the ENERGY STAR program for ASHP and CAC products and is available for further discussion regarding.

Please feel free to contact us with any further questions.

Sincerely,



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