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November 19, 2020

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 Final Draft Specification.

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 Final Draft Specification* as published by the EPA on October 22, 2020.

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.

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. A consistent set of specifications that can be promoted by all efficiency programs in the US and Canada makes it easier for contractors, distributors, and manufacturers to engage and hence allows for a larger impact on the market for enhanced energy efficient products

Lennox had commented previously on the Draft 2 specification and appreciates changes the EPA made in the Final Draft to revise performance levels and eliminate the staged/variable capacity requirement as well to align the effective date with the 2023 Department of Energy (DOE) ASHP and CAC minimum energy conservation standards (Draft 2). But 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 in the midst of the COVID pandemic. To ensure continued participation and success for the ENERGY STAR Lennox recommends that EPA strongly consider the following for the residential ASHP and CAC specifications:

- *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 should not impose regional requirements.*
- *AHRI 1380 should be the only requirement for optional connected criteria.*
- *ENERGY STAR criteria should be performance based using DOE required metrics and must avoid prescriptive requirements.*

Historically, when EPA overreaches by imposing uncoordinated or burdensome ENERGY STAR requirements, participation in the program declines precipitously. While Lennox conceptually supports the ENERGY STAR program, Lennox will continue to evaluate participation based on cost, value and the associated return on our investment. EPA’s proposal to impose significant changes to the ENERGY STAR program beyond incremental nationally based performance requirements risks Lennox’s participation in the program and potentially a similar decline in ENERGY STAR participation within the HVAC industry. 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 and would need to seriously consider our continued participation in the program if enacted. Lennox prior comments and discussions included a summary of the extraordinary regulatory changes that HVACR manufacturers are in the midst of even before the outbreak of the COVID pandemic. The pandemic has forced Lennox to solely focus on mission critical items to sustain our business. Due to this and limitations of the ENERGY STAR program value, while the Final Draft does address some of the issues identified by the industry, 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 Proposed Draft 2 Criteria.

1. *ENERGY STAR performance criteria should be set at reasonable thresholds that average consumer can afford aligned with ENERGY STAR’s Guiding Principles to encourage manufacturer and market participation.*

Manufacturers are in the midst of extraordinary regulatory changes requiring significant development efforts to meet the 2023 standards as well as address ongoing regulatory developments. The transition to low GWP refrigerants will effectively double manufacturer design efforts to achieve the 2023 standard. Major changes to the ASHP/CAC ENERGY STAR program at this juncture could lead to a significant decline in industry participation in the program, contrary to the goals of the ENERGY STAR program. Lennox believes the EPA ENERGY STAR program can effectively promote increased energy efficiency 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.

While Lennox finds the performance levels proposed in the Final Draft specification to be acceptable other requirements in the Final Draft are overly stringent and not in alignment in

alignment with ENERGY STARS Guiding Principles. While Lennox recognizes that the 6.0 specification is forward looking, the specifications must be reasonable for the program to be successful, this is particularly true for manufacturers who are trying to maintain their businesses in the midst of a global pandemic.

2. Regionally-specific performance requirements beyond current federal metrics should be avoided.

Lennox strongly opposes EPA imposing new regional requirements into the ENERGY STAR program for ASHP products. The ENERGY STAR program should take a national approach 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. Having one set of specifications that can be promoted by all efficiency programs in the U.S. and Canada makes it significantly more cost effective for contractors, distributors, and manufacturers to participate in programs like ENERGY STAR and hence allows for a larger impact on the market for enhanced energy efficient products. Regional requirements slice the market into smaller segments and will limit participation in the program, as they necessitate regional specific product designs which individual manufacturers may not be in a position to provide due to the need for additional models, increased costs and limited opportunity in certain markets. This segmentation can reduce consumer offerings and thus competition and has negative market impact on higher efficiency products due to limited consumer choice and higher product cost. Accordingly, ENERGY STAR should not impose new regional ASHP requirements, including tightened HSPF and new Coefficient of Performance (COP) and Percentage of Heating Capacity requirements and associated additional CVP controls test requirements which increase test burden.

3. Lennox supports AHRI 1380 as optional connected criteria.

Lennox supports AHRI 1380 standard for grid responsive systems (DR) and encourages the EPA to expand its current ENERGY STAR Communicating Thermostat Specification to recognize products that provide this capability beyond typical set-back DR approaches. The industry is working toward a Certification program for 1380 and this standard should be the only criteria for optional connected criteria.

4. ENERGY STAR criteria should be performance based using DOE required metrics and must avoid prescriptive requirements for CAC and ASHP products.

EPA must not impose both performance standards and a prescriptive “design requirements” on air-conditioning and heat pump equipment. 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)). Furthermore, EPCA enumerates specified products for which a design standard can be established and does not include central air conditioners.

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 Capabilities 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. While these are beneficial features they are focused on premium products where the product cost increase can more easily be absorbed by consumers who can afford them. The base ENERGY STAR program should focus on reasonable performance thresholds that are affordable to average consumers and programs that can assist low income consumers who may need improved energy efficiency the most to reduce energy cost.

The EPA should base the primary criteria for the ENERGY STAR ASHP and CAC programs on the federally-mandated energy efficiency metrics for these products allowing manufacturers to find the most innovative and cost effective solution and avoid additional prescriptive requirements. 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 STARS Guiding Principles. EPA should not stray from setting performance-based standards using existing federal metrics for this equipment.

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 must avoid prescriptive requirements. 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,

A handwritten signature in cursive script that reads "David Winningham".

David Winningham
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