

September 6, 2013

**VIA E-MAIL**

[mostefficient@energystar.gov](mailto:mostefficient@energystar.gov)

**RE: MEUS Comments on Proposed ENERGY STAR Most Efficient 2014 Recognition Criteria**

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To Whom It May Concern:

Mitsubishi Electric US, Inc. ("MEUS"), a manufacturer of ductless mini-splits, multi-splits and Variable Refrigerant Flow (VRF) HVAC systems, appreciates the opportunity to submit the following comments regarding the above captioned matter: Proposed ENERGY STAR Most Efficient 2014 Recognition .

- 1. Product must be ENERGY STAR certified consistent with applicable ENERGY STAR Partner Commitments and the requirements set forth in the Version 4.1 ENERGY STAR Program Requirements Product Specification for Central Air Conditioners/Air-Source Heat Pumps. Product performance must be certified by a certification body recognized by the U.S. Environmental Protection Agency (EPA).**

No comment.

- 2. Products must meet the following cooling and heating performance levels: 20 SEER, 12.5 EER and (for heat pumps) 9.6 HSPF.**

No comment.

- 3. Non-ducted air conditioners and heat pumps must have an indicator that the filter needs checking and/or cleaning, and an indicator that the system is in need of service by a certified technician. It is recommended that these indicators display in plain text on the consumer control.**

As the ENERGY STAR Most Efficient brand gains more recognition in the marketplace, MEUS encourages ENERGY STAR to remain mindful that the proliferation of highly efficient ductless split air conditioners and heat pumps is not always in synch with the advancement of controller functionality. The stated goal of the "Most Efficient" initiative is to "drive more energy efficient products into the market more quickly."<sup>1</sup> As a result, ENERGY STAR has set high efficiency benchmarks for manufacturers to achieve.

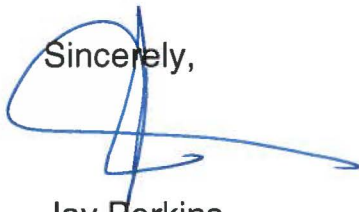
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<sup>1</sup> ENERGY STAR "Most Efficient 2013 Update and 2014 Proposals." August 22, 2013.

While manufacturers like MEUS have several qualifying “Most Efficient” HVAC products, the advancement of controller functionality is an entirely separate industry that accompanies HVAC development. Controllers must be able to practically integrate with existing system platforms. While ENERGY STAR’s “preferences” (as opposed to requirements) listed in the proposed 2014 criteria continue to set the pace for future development, they should not serve as a barrier to the recognition of an already highly efficient product.

Mitsubishi Electric appreciates the opportunity to comment on these important issues. Please feel free to contact me by phone at 678-275-8803 or by email at [jdperkins@hvac.mea.com](mailto:jdperkins@hvac.mea.com) for clarification or additional information.

Sincerely,



Jay Perkins  
Senior Government Affairs Specialist  
Mitsubishi Electric Cooling & Heating  
A division of Mitsubishi Electric US, Inc.