



NRDC Comments on EPA ENERGY STAR's Draft 1 Version 4.0 Specification for Room Air Conditioners

November 19, 2014

On behalf of the Natural Resources Defense Council (NRDC) and its more than 1.4 million members and online activists we respectfully submit the following comments on the EPA ENERGY STAR's Draft 1 Version 4.0 Specification for Room Air Conditioners.

NRDC supports updating the room air conditioner specification. NRDC continues to support EPA's decision to update the room air conditioner specification. The updated minimum standards for room air conditioners took effect earlier this year which necessitates an update to the ENERGY STAR specification if EPA is to maintain this product category. An updated specification for room air conditioners has the potential to generate significant energy savings. As noted in our comments on the framework document, sales of room air conditioners have been increasing since 2009 (when there was a dip due to the recession) and the global market for room air conditioners is also growing.¹ An updated Energy Star specification would lead to energy savings both in the US and most likely internationally as the specification would influence global markets for room air conditioners. Additionally, an updated specification for room air conditioners will not only lead to overall energy savings, but also have the added benefit of reducing peak demand on hot summer days. These additional benefits, the increasing global market for room air conditioners, and the likely existence of cost-effective energy savings all support the fact that EPA should update the Energy Star specification for room air conditioners.

NRDC supports the proposed specification levels. NRDC supports EPA's proposal to set the specification at 10 percent better than the national minimum standard. While there is limited product availability at these levels, there are multiple technology options available to manufacturers to meet these levels and EPA's analysis shows that these levels will be cost-effective for consumers, with an average payback of 4.6 years. As EPA notes and DOE documents in the final rule technical support document, there are many options for increasing the efficiency of room air conditioners, such as increasing the efficiency of heat transfer, improved fan design, increased motor efficiency, alternative refrigerants, reducing air recirculation, higher efficiency compressors, reduced standby power and improved part load efficiency.

¹ http://www.superefficient.org/Resources/~media/Files/EEDAL%20Papers%20-%202013/031_Shah_finalpaper_EEDAL13.pdf

NRDC supports the inclusion of installation requirements. As noted in our comments at the framework stage, requirements for installation measures will lead to additional field savings that are not captured by the test procedure. Specifically, we support the minimum R-value requirement for room air conditioner side curtains. We continue to recommend that EPA consider developing an additional performance specification with respect to these features, such as a requirement for maximum total leakage and/or heat transfer across the air conditioner when installed as sold and directed.

Thank you for the opportunity to submit these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Meg Waltner", with a long horizontal flourish extending to the right.

Meg Waltner
Manager, Building Energy Policy