



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

February 2, 2015

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 Final Draft Version 4.0 Specification for Room Air Conditioners.

NRDC continues to support updating the ENERGY STAR specification for room air conditioners. As discussed in comments on the Framework Document and Draft 1, NRDC supports EPA's decision to update the room air conditioner specification. The updated national minimum standards set by DOE for room air conditioners that took effect in 2014 are equal to and in some cases exceed the current ENERGY STAR specification for room air conditioners. Given the updated minimum standards, the ENERGY STAR specification must be updated if EPA is to maintain room air conditioners as a product category. Furthermore, as EPA has identified, cost-effective opportunities exist to improve the efficiency of room air conditioners beyond the federal minimum standard. An updated specification for room air conditioners has the potential to generate significant energy savings, as well as to reduce peak demand.

An Energy Star specification is especially important for room air conditioners, which are a discretionary purchase. For many other products, Energy Efficiency Program Administrators can provide rebates for more efficient products, but for room air conditioners, many Administrators may find that the rebate causes more air conditioners to be sold and thus doesn't really save power or energy. But in the case of a voluntary specification, this problem will not occur and so an Energy Star specification is particularly important.

NRDC continues to support the proposed specification levels. NRDC continues to support EPA's proposal to set the specification at 10 percent better than the national minimum standard. As noted by EPA, there are multiple technology options available to manufacturers to meet these levels, including 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. EPA's analysis shows that these levels will be cost-effective for consumers, with an average payback of 4.6 years, for a product that lasts an average of 10.5 years.¹ NRDC also continues to support the proposed installation requirements that

¹ <http://www.regulations.gov/#!documentDetail;D=EERE-2007-BT-STD-0010-0050>

include installation materials, such as side-curtains with minimum insulation value of R-1, and instructions to facilitate installation that minimizes air leakage and thermal losses. These requirements will lead to additional field energy savings. We are disappointed with the removal of the requirement for through the wall units to be sold with covers, as this would have led to additional field energy savings and encourage EPA to evaluate this measure for future specification revisions.

We strongly urge EPA to finalize the Final Draft specification and to maintain the proposed effective date of October 2015, so that consumers start to realize the energy savings from these products as soon as possible. This date will also positively influence the selection of models that appear on the shelves during the 2016 cooling season as large retailers like Sears and Home Depot place their orders several months in advance.

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