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November 19, 2020

Ms. Abigail Daken
Manager, ENERGY STAR® HVAC Program
U.S. Environmental Protection Agency
E-mail: CAC-ASHP@energystar.gov

RE: ENERGY STAR Central Air Conditioners & Heat Pumps Final Draft Version 6.0 Specification

Dear Ms. Daken:

Rheem Manufacturing Company (“Rheem”) appreciates the opportunity to submit the following comments regarding ENERGY STAR Product Specification for Air Source Heat Pump and Central Air Conditioner Equipment Eligibility Criteria Final Draft Version 6.0 (“Final Draft”).

Rheem is an industry leader for total heating, cooling and water heating solutions and one of the few global brands with product offerings covering residential and commercial heating, cooling, conventional and hybrid storage water heaters, tankless water heaters, solar water heating systems, pool and spa heaters, commercial boilers, residential hydronic and geothermal systems, indoor air quality accessories, and replacement parts for all categories. Rheem, headquartered in Atlanta, Georgia, operates a state-of-the-art Parts Distribution center in Randleman, NC and Salt Lake City, UT, and operates distribution facilities throughout the US, Canada and many other countries around the world. It manufactures in Fort Smith, Arkansas; Montgomery, Alabama; Scottsboro, Alabama; Waterbury, Connecticut; and Oxnard, California. All manufacturing facilities are ISO 9001 certified.

Rheem is a long-standing participant in the Energy Star program and truly values the efforts of the EPA to bring information about cost-saving energy efficient solutions to consumers. However, Rheem remains opposed to the overreaching requirements of the Final Draft in terms of (1) efficiency criteria, (2) region-specific performance requirements, and (3) implementation date. Rheem supports a national, performance-based efficiency program that recognizes accessible energy-saving products as originally intended by the ENERGY STAR program.

Efficiency Criteria

While Rheem appreciates the EPA responding to industry concerns with the adjusted efficiency requirements proposed in the Final Draft, the stringency of levels and number of measures remain burdensome, such that only the top-of-the-line products would meet the specification. Rheem was disappointed to see that the Final Draft specification indicates no adjustment to the EER2 requirements for central air conditioning or heat pumps versus Draft 2. As mentioned in



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previous comments, 12.0 EER2 specification is likely to be out of reach for all but single-stage equipment. Rheem believes this will result in reduced participation from manufacturers, with fewer models meeting the specification and many out of economic reach for most consumers.

Region-specific Performance Requirements

As previously expressed, Rheem does not support inclusion of climate-specific criteria for heat pumps in the ENERGY STAR program. Rheem discourages regional specifications because it adds complexity, complicates harmonizing between ENERGY STAR and other energy efficiency specifications, and only serves to make it more costly for manufacturers, distributors and contractors to participate. Rheem is also strongly against labeling for all the various combinations of products due to the added burden on manufacturers coupled with the lack of effectiveness in influencing consumer choice.

Implementation date

The specification effective date January 1, 2023 remains problematic, as manufacturers need to prioritize the many regulatory changes occurring simultaneously. Rheem is currently working to transition to the new DOE test procedure, Appendix M1, designing for new DOE energy efficiency standards for commercial and residential products in 2023, followed by converting all products for use with A2L refrigerants shortly thereafter. The product designs for these mandatory regulatory requirements must be prioritized over those for voluntary programs.

Rheem recommends that EPA revisit earlier comments from manufacturers and make substantial revisions in order to maintain a viable program. Absent such change, Rheem would recommend discontinuing the program for air conditioning and heat pumps on December 31, 2022.

Rheem reiterates that it has certified equipment to the Energy Star specifications for many years and appreciates the opportunity to provide comments. If you have any questions regarding this submission, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Allison J. Skidd".

Allison J. Skidd
Sr. Manager, Global Regulatory Affairs – Air
Rheem Manufacturing Company

CC: Karen Meyers

