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February 23, 2021

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

RE: ENERGY STAR CAC-HP Version 6.0 Limited Topic Proposal on Installation Criteria

Dear Ms. Daken:

Rheem Manufacturing Company ("Rheem") appreciates the opportunity to submit the following comments regarding ENERGY STAR Limited Topic Proposal on Installation Criteria ("Proposal") for the Central Air Conditioner and Heat Pump Version 6.0 Specification.

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 supports the notion of reducing the applicability of the installation criteria as outlined in the Proposal, but we feel it does not go far enough in reducing the unnecessary requirements for ENERGY STAR qualification. While variable capacity systems typically have greater communication capabilities than single- or two-stage systems, the installation criteria remain overly prescriptive and risk exclusion of otherwise efficient variable systems. Furthermore, the installation criteria add unnecessary complexity to the qualification process as in calling for additional examination of the product and associated documentation.

Rheem continues to support a national, performance-based efficiency program that recognizes accessible energy-saving products as originally intended by the ENERGY STAR program. To that end, we request that these and earlier comments be considered and the specification revised accordingly.



INTEGRATED HOME COMFORT



Rheem appreciates the multiple opportunities to provide comments and looks forward to continued collaboration.

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

