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November 23, 2021

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

RE: ENERGY STAR CAC-HP Version 6.1 Central Air Conditioner and Heat Pump (CAC/HP) Specification

Dear Ms. Daken:

Rheem Manufacturing Company (“Rheem”) appreciates the opportunity to submit the following comments regarding proposed amendments to the ENERGY STAR CAC/HP Product Specification, referred to as Version 6.1.

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, manufactures in Fort Smith, Arkansas; Montgomery, Alabama; Scottsboro, Alabama; Waterbury, Connecticut; and Oxnard, California, and operates distribution facilities throughout the US, Canada and many other countries around the world.

Rheem appreciates the intent of adjustments to EER2 criteria in the 6.1 draft, taking into account the effect of multiple or continuously variable speeds. However, the revised requirements remain inconsistent with the EER2 criteria from the U.S. Department of Energy (DOE), and the delineated criteria for multi-stage systems in the 6.1 draft add unnecessary complexity. In the latest Energy Conservation Standards¹ (ECS) for CAC/HP, DOE specifies a lower EER2 requirement for equipment at or above 15.2 SEER2 and also adjusts for capacity. Rheem recommends that the 6.1 criteria be technically aligned with DOE ECS structure, as this would simplify the ENERGY STAR® requirements without sacrificing system efficiency (assuming that the SEER2 requirements remain.)

Rheem supports the notion of improving installation practices for the sake of preserving system efficiency, however the installation capabilities outlined in the 6.1 add further cost and design burden to manufacturers instead of addressing directly with installers. While the 6.1 draft has somewhat reduced requirements of the installation capabilities as compared to the 6.0 specification, it does not go far enough in removing unnecessary qualification burden for efficient systems. The specification of installation capabilities remains overly prescriptive and risks exclusion of otherwise efficient variable systems.

¹10 CFR Part 430: Energy Conservation for Consumer Products



INTEGRATED HOME COMFORT



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 respectfully request that these and earlier comments be considered and the specification revised accordingly.

Rheem appreciates the opportunity 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

