
Hi Ms. Daken,

My name is Kevin Gemme, I am in charge of Sales at **Sunrise Tradex Corporation (Gree Canada)**. We have been in the importation and distribution of residential and light commercial heat pump products for almost 20 years in Canada. Our company works with various brands, including Gree, ForestAir, Ecoer, ect...

I was informed by Caroline Côté about the Energy Star® Central Air Conditioners & Air-Source Heat Pumps review that is currently ongoing and she took some time with me to discuss the process and the deadlines involved. With that in mind, I am sharing with you our comments with regards to the 1st draft of the review which werw presented on May 10th 2019.

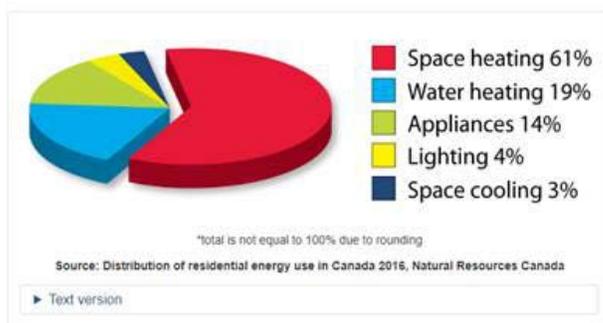
Being in Canada, we ourselves are in a “Cold Climate” zone, so our comments will only pertain to those requirements. Speaking of, we are excited to see the proposed climate differentiation of “Moderate and Hot Climate” and “Cold Climate” as heat pumps are indeed used very differently depending on the climate.

With that in mind, please see this link below that shows the distribution of residential energy use in Canada (cold climate zone): <https://www.nrcan.gc.ca/energy/products/categories/heating/13740>

Heating equipment for residential use

Buy ENERGY STAR® certified heating equipment to save you money!

Canada's cold climate means that space heating accounts for a **remarkable 61% of the energy used in the average Canadian home**. No wonder you should look to heating to find energy savings opportunities!



As you can see clearly through this chart, **homeowners living in Cold Climate zones such as Canada spend the big majority of their energy use is for space heating (61%), and very little of their energy in space cooling (3%).**

Considering the changes suggested in this initial draft, we do believe this information is known on your end. With that said however, our opinion is that **the requirements for Energy Star should be even more demanding on heating efficiencies, and less demanding on cooling efficiencies.**

Here are the suggested changes presented in the 1st draft:

Product Type	Cold Climate				
	SEER	EER	HSPF	COP @ 5°F	Percentage of Heating Capacity @ 5°F
ASHP Split Systems	≥ 16.00	≥ 11.50	≥ 9.00	1.75	80%
ASHP Single Package Equipment	≥ 16.00	≥ 11.00	≥ 9.00	1.75	80%

In our view, the requirements should be as adjusted as follows (the differences are in shown in red):

Product Type	Cold Climate Zone				
	SEER	EER	HSPF	COP @ 5F	% of Heating Capacity @ 5F
ASHP Split Systems	≥16	≥11	≥9.5	≥2	80%
ASHP Single Package Equipment	≥16	≥11	≥9.5	≥2	80%

Here are the arguments for our suggested changes:

- **Minimum EER from 11.5 to 11 (or ENTIRELY removed from specification requirements)**
 - In our opinion, with the current proposed changes, we believe the EER requirement suggested in the 1st draft will sort out too many efficient systems available in the market.
 - The biggest issue with EER is that it puts fully inverter ASHP at a disadvantage as the calculation of EER evaluates the unit when it is working at 100% capacity in cooling (which rarely ever happens with fully inverter systems). This is especially apparent in the market nowadays for Central ASHP, where many less efficient staged ASHPs (also called On/Off systems) are labelled Energy Star when other more efficient, fully inverter ASHPs are not.
 - More importantly, we believe the EER rating requirement should be reduced or even removed because, once again, efficient Space Cooling is not where homeowners in Cold Climate zones will use most of their energy on; Space Heating is where they will. Most installers in the marketplace know this from experience and are thus already explaining it to their customers that their focus should always be looking into HSPF and COP first, not SEER and EER.

- **Minimum HSPF from 9 to 9.5 and Minimum COP @ 5F from 1.75 to 2**
 - Considering that HSPF is the best measure of efficiency in heating for ASHP's all year long, we believe it is important to ask manufacturers to push their development to reach high numbers for that specification. Moreover, we believe that setting the HSPF at 9.5 would still allow many manufacturers to have their current models labelled Energy Star, and only help promote the development of ASHP's with higher HSPF's for future years
 - As for the COP, we also believe that many current products would be able to meet the requirement of =2 COP at 5F, and would continue to promote the message that the standards for ASHP in cold climates are to show efficiency in heating at low outdoor temperatures.
 - We also want to point out that the COP and the Percentage of Heating Capacity at 5F, are in our opinion great additions to the required measured specifications to ensure the ASHPs certified are able to heat with minimal use of back-up heating in cold climates.

Based on our experience, these are the comments we have on the initial first draft that was submitted on May 10th. We sincerely appreciate that you are interested in receiving feedback from Energy Star members and people that are form the industry to pinpoint how the requirements should be setup. If you would like to have more details on the arguments mentioned above, please let me know and I will be glad to further discuss so that the requirements are adjusted so that manufacturers are pushed in the right direction in their product development for years to come.

Best regards,



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