



November 19, 2020

Ms. Abigail Daken
EPA - ENERGY STAR
1200 Pennsylvania Ave NW
Washington, D.C. 20460

(Submitted via email to CAC-ASHP@energystar.gov)

Re: Product Specification for Central Air Conditioner and Heat Pump Equipment--
Eligibility Requirements, Draft 2, Version 6.0

Dear Ms. Daken,

Thank you for the opportunity to submit comments in response to Draft 2, Version 6.0 of Energy Star's Product Specification for Central Air Conditioner and Heat Pump Equipment.

Trane Technologies (Trane) is a world leader in creating comfortable, sustainable, and efficient environments and leading our industry in sustainability practices. Through our strategic brands Trane and Thermo King, and our portfolio of environmentally responsible products and services, we bring efficient and sustainable climate solutions to buildings, homes and transportation. Our bold 2030 Sustainability Commitments are central to our business strategy and include a pledge to reduce our customers' carbon emissions by one gigaton (2% of the world's annual emissions) and to bring our own operations to carbon neutral. These commitments challenge us to lead by example, collaborate with our customers to drive sustainable innovation and create opportunity for all in our workplace and our communities.

Thank you for considering our previous comments through adjusting the energy efficiency levels. We strongly support the EnergyStar program and offer the following recommendations to prevent a drastic reduction in the amount of equipment that will meet the proposed requirements of EnergyStar certification:

1. Move Installation Criteria to the Connected Equipment Category
2. Harmonize Connected Criteria completely with AHRI 1380
3. Remove Controls Verification Procedure (CVP) until its Test Procedure is Proven

Move Installation Criteria to the Connected Equipment Category

The proposed Installation Capabilities for any EnergyStar product will drastically reduce the number of products that would otherwise qualify, along with manufacturer



participation. Qualifying products will be significantly more expensive and will likely push EnergyStar products out of reach from many consumers. **Trane recommends that the Installation Capabilities be removed as a requirement for a base-level EnergyStar product, but instead be added as a requirement to achieve the Connected Product Criteria.**

Harmonize Connected Criteria completely with AHRI 1380

As mentioned in previous comments, we support the inclusion of Connected Criteria that is completely harmonized with a recognized industry standard, AHRI 1380, without modifications. Draft 2 Version 6.0 contains requirements that are not included in AHRI 1380, including the requirement to transmit measured or estimated instantaneous power draw in current conditions and the requirement to report operational state. **Trane recommends removing these requirements to ensure that EnergyStar requirements for Connected Equipment are met through certification to AHRI 1380.**

Remove the Controls Verification Procedure until its Test Procedure is Proven

Trane strongly discourages implementation of any test procedure that is still largely unproven. Despite substantial efforts, the system control testing of HVAC equipment has not achieved adequate uncertainty, repeatability, or reproducibility. It is important to adopt a specific standardized test procedure that is accurate and practical to uphold the integrity of the EnergyStar program and to retain participation from the industry. **Trane recommends against including the Controls Verification Procedure requirement until the test method can be proven to provide accurate results.**

Thank you for providing the opportunity for us to submit comments. Please contact me directly with any questions.

Sincerely,

James T. VerShaw

James T. VerShaw
Chief Engineer

CC: Jennifer Kane, Trane Technologies