

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



OFFICE OF
AIR AND RADIATION

February 28, 2014

Dear AHRI,

After careful consideration, given certain unique features of the CAC/ASHP product category, EPA has concluded that the AHRI Certification Program for Unitary Air-Conditioner Equipment is generally consistent with the ENERGY STAR program's overarching goal of protecting the integrity of the ENERGY STAR label and ensuring that consumer expectations are met. As such, the Agency has decided that this approach is an acceptable alternative for purposes of initial ENERGY STAR certification of products in this category.

Initial Certification

CAC/ASHP products are unique among ENERGY STAR product categories. The number of configurations of CAC/ASHP products far exceeds that of any other category, with a total of nearly 1.8 million configurations available on the market. Because of this tendency towards large numbers of configurations, minimum federal standards and the ENERGY STAR program allow CAC/ASHP product simulations to be used to qualify many configurations based on the testing of one related unit.

In the absence of required testing for most configurations, AHRI has satisfied ENERGY STAR certification requirements by performing reviews of lab reports and simulation results for purposes of initial qualification of ENERGY STAR CAC/ASHP models. Across the ENERGY STAR program, review of certified product information adds value by improving the accuracy of ENERGY STAR Certified Product Lists, which are populated with data transmitted from certification bodies. However, also because of the significant number of CAC/ASHP product configurations, EPA does not offer a listing of CAC/ASHP products certified by AHRI, but relies on the listing AHRI maintains for purposes of its existing certification program.

Consistent with the unique qualities of this category, AHRI's longstanding CAC/ASHP certification program places an emphasis on qualifying a manufacturer for their program based on a review of their rating procedures. This review includes an application package, qualification tests for 20% of all models with additional testing at AHRI's discretion, as well as witness test facility approval where applicable. This manufacture-level review is complemented by the performance of more extensive post-market testing, which captures configurations beyond those initially tested by the manufacturer and thereby verifies both the validity of the modeled rating and the delivered savings.

Given these considerations, EPA has concluded that AHRI's approach to ensuring accurate initial ratings, combined with your enhanced after-market testing, provides a comparable level of oversight without the additional documentation currently being performed for ENERGY STAR certification.

Verification Testing Samples

Under the ENERGY STAR verification testing requirements, CAC/ASHP manufacturers have the option to test four units, as long as three additional units are set aside during verification testing of the first unit. Under AHRI's existing program, one additional sample test is required if the first fails, and the sample need not be held in anticipation of its use. While AHRI's approach may be consistent with the program objective of ensuring manufacturers maintain accurate certified ratings, it is not sufficiently conclusive for the ENERGY STAR program, whose overarching objective is to ensure that every labeled model meets ENERGY STAR requirements.

EPA would like to allow an alternate approach for partners to alleviate inventory issues associated with having additional models wrapped for potential additional testing. This option would allow a partner to elect to not have three additional units wrapped when the first unit is selected and shipped to the laboratory. However assuming they would like to use the multiple sample approach, they will have to authorize AHRI to come back to the warehouse if needed and randomly select, wrap, and ship the additional models to the laboratory. The additional units must be selected immediately following the failure of the first sample such that testing is initiated within 10 business days of determining the first unit failure. Failure to initiate testing on the additional models within this time frame for any reason will result in the model being evaluated based on the one sample already tested and AHRI being required to report the failure to EPA immediately.

Defect Claims

Under EPA's disqualification procedures for ENERGY STAR products, manufacturers have the opportunity to dispute testing failures on various grounds, including product defects. For CAC/ASHP products, there are a class of defects that render the unit unable to operate in accordance with installation and operating instructions. For defects of this nature, AHRI's existing program allows for retesting prior to any determination of a testing failure. Given the limited number of instances this claim is invoked (less than 1% of all tested products), EPA finds this policy acceptable, as long as all other types of defect claims are reserved for EPA consideration as part of the Agency's disqualification procedures.

Sincerely,



Ann Bailey, Chief
ENERGY STAR Labeling Branch
U.S. Environmental Protection Agency