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March 21, 2012

Via E-Mail

Amanda Stevens
U.S. Environmental Protection Agency
ENERGY STAR Appliance Program
appliances@energystar.gov

Re: ENERGY STAR Room Air Conditioners
Draft 3 Version 3.0 Specification Document

Dear Ms. Stevens:

On behalf of the Association of Home Appliance Manufacturers (AHAM), I would like to provide our comments on the ENERGY STAR Room Air Conditioners Draft 3 Version 3.0 Specification Document.

AHAM represents manufacturers of major, portable and floor care home appliances, and suppliers to the industry. AHAM's membership includes over 150 companies throughout the world. In the U.S., AHAM members employ tens of thousands of people and produce more than 95% of the household appliances shipped for sale. The factory shipment value of these products is more than \$30 billion annually. The home appliance industry, through its products and innovation, is essential to U.S. consumer lifestyle, health, safety and convenience. Through its technology, employees and productivity, the industry contributes significantly to U.S. jobs and economic security. Home appliances also are a success story in terms of energy efficiency and environmental protection. New appliances often represent the most effective choice a consumer can make to reduce home energy use and costs.

AHAM supports EPA and the Department of Energy (DOE) in their efforts to provide incentives to manufacturers, retailers, and consumers for continual energy efficiency improvement.

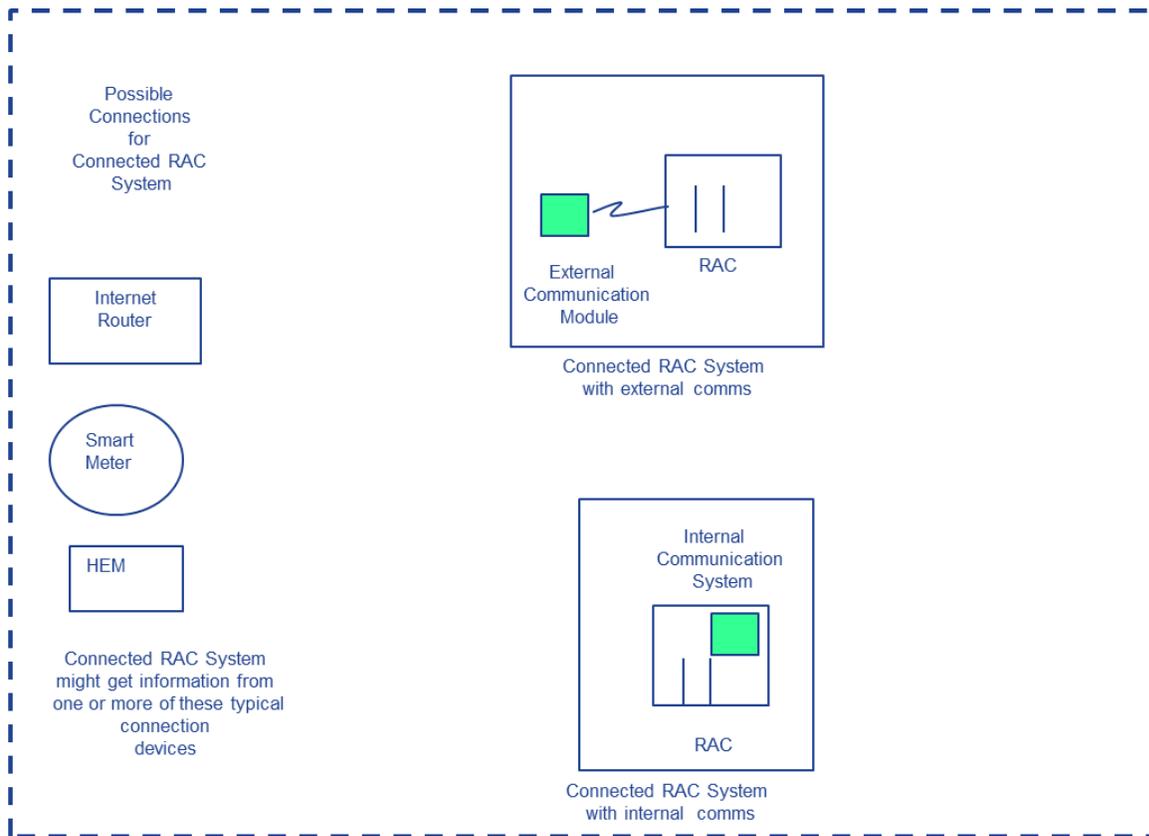
I. Connected Product Criteria

EPA proposes that products that meet the proposed criteria in Section 4 of the specification would be eligible to earn a 5% allowance. The allowance is intended to serve as an incentive to help jump start the market for room air conditioners with smart grid functionality. AHAM strongly supports ENERGY STAR's decision to incorporate smart grid functionality and to provide a 5% allowance consistent with the Joint Petition from industry, efficiency advocates and environmental groups. AHAM has made recommendations for changes provided in track

changes format to Section 4 of the draft specification which is attached and further explained below. (Attachment A)

Section 4, First paragraph

The first paragraph provides an overview; however, additional language is needed for clarification on the discussion for the system under consideration. AHAM proposes to include the following in order to define the system boundaries: “the connected room air conditioner is an appliance that provides all the necessary hardware and software for communications”. For further clarification, below is a diagram to illustrate the system boundaries.



Section 4.A

EPA proposes to title this section “Home Energy Management (HEM) Functionality;” however, this title is confusing. When defining the system boundaries as above, it should not be the intent to include home energy management functionality in this standard, only the ability to connect and communicate with a home energy manager external to the system under consideration. A more accurate title might be “Connectivity to Support Home Energy Management.”

Section 4.A.1

The language in this section should not specify increment of time, only the units (i.e., representations of watt-hours or watts) and the update rate. AHAM supports a clarification regarding when updates should occur and propose the following additional language: “The data shall represent energy consumed by the product in watt-hours for intervals of 15 minutes or less per manufacturer specifications.” Manufactures can best determine the calculations based on the frequency of the measurement. Power feedback can be provided on the product itself without transmitting and this provides flexibility to manufacturers. Transmission should therefore not be a requirement of the specification.

Section 4.B

AHAM appreciates the flexibility proposed by ENERGY STAR by providing additional options in the specification for demand response functionality. AHAM will provide a smart RAC test procedure which will include both options to ENERGY STAR.

Section 4.C.2

AHAM proposes that for all of Section 4, “Connected Product Criteria,” standards that have been reviewed under the Smart Grid Interoperability Panel (SGIP) process and through other open, non-proprietary standard development organizations should be utilized. The SGIP is an open and collaborative process among major stakeholders for the smart grid coordinated by the National Institute for Standards and Technology (NIST) and includes a rigorous process for review. Standards that do not meet this level of review through an open process should not be included in this specification.

Section 4.C.6 Effective Date

EPA proposes a specification effective date of January 30, 2013. AHAM would like to further discuss that effective date with EPA in light of several complex timing and regulatory factors.

AHAM appreciates the opportunity to submit comments on the ENERGY STAR Room Air Conditioners Draft 3 Version 3.0 Specification and would be glad to further discuss these matters.

Best Regards,



Charlotte Skidmore
Director, Energy & Environmental Policy