

June 11, 2012

Amanda Stevens
US Environmental Protection Agency
Ariel Rios Building 6202J
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Ms. Stevens:

The Consortium for Energy Efficiency (CEE) respectfully submits the following comments in response to the *ENERGY STAR® Final Draft Version 3.0 of the Residential Room Air Conditioner Specification*, released by the Environmental Protection Agency (EPA) on May 16, 2012.

CEE is the binational organization of energy efficiency program administrators and a staunch supporter of the ENERGY STAR® Program. CEE members are responsible for ratepayer-funded efficiency programs in 45 US states and eight Canadian provinces. In 2011, CEE members directed over \$7.8 billion of energy efficiency program budgets in the two countries. CEE's Members work to strengthen ENERGY STAR as a platform for energy efficiency across North America.

CEE highly values the role ENERGY STAR plays in differentiating energy efficient products and services that the CEE membership supports locally throughout the US and Canada. We appreciate the opportunity to provide these comments.

Timing of New Efficiency Requirements

On January 26, 2011 CEE submitted a comment letter indicating no opposition to the proposed efficiency levels, but expressed concern regarding the effective timing given our understanding of the production time that may be required by manufacturers. We recognize that EPA has postponed the effective date of the specification to October 1, 2013, and we support this decision.

CEE Supports the Careful Consideration of Enhanced and Demonstrable Consumer Benefit

CEE stands committed to assist in supporting the incorporation of "Connected" functionality into the Program while working to ensure that the Program continues to represent the core tenet of

cost-effective energy savings to consumers. We look forward to working with EPA through a process of careful consideration that pursues additional value while maintaining Program integrity.

We support EPA's plans to work with DOE to develop a test procedure for "Connected" functionality and support the decision to award a performance credit once—but not until—a "Connected" test procedure has been vetted with stakeholders and finalized. CEE also agrees with EPA's decision to remain silent on "Connected" requirements until resolution is obtained on issues of importance, including those related to open, standardized, communication protocols.

Thank you for your consideration of these comments. Please contact CEE Program Manager Eileen Eaton at (617) 337-9263 with any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ed Wisniewski".

Ed Wisniewski

Executive Director