



Ms. Abigail Daken
ENERGY STAR HVAC Program Manager
U.S. Environmental Protection Agency
Office of Air and Radiation
Washington, DC 20460

Ms. Daken,

Thank you for the opportunity to provide a few high level comments to ENERGY STAR as the Agency works to develop a revised criteria for Central Air-Conditioner and Air-Source Heat Pump (ASHP). Our comments will be specific to the ASHP portion of the Specification Framework (Version 5.0)

NEEP and several of the regions' stakeholders have identified ASHPs as a potentially game changing HVAC technology for the Northeast/Mid-Atlantic region, with exciting associated energy savings. Northeast Energy Efficiency Partnerships (NEEP) would like to alert the Agency that our organization has recently launched a process to develop a Regional Market transformation strategy report for ASHPs. The report will be complete by early October and will lay out a number of recommended strategies to accelerate market uptake of this technology. Our process has just launched recently so we anticipate a far more robust engagement with the criteria revision during the next round of development (Draft 1).

In the meantime, here are a few brief comments;

1. The Northeast/Mid-Atlantic has a clear track record in utilizing the ENERGY STAR criteria to promote ASHPs. A summary of energy efficiency program activity in the region can be found in the Attachment including the specific technical requirements for incentive qualification. Most reference ENERGY STAR as a part of the qualification requirements, however we are still in the process of understanding the specific value that the ENERGY STAR labeling program provides the ASHP market and it's actors.
2. Regional Specification
 - a. In general, NEEP supports regionally unique efficiency/performance criteria in the case of select HVAC products, especially when their operating is highly dependent on the region they are operated in. NEEP was a signatory of Advocate-AHRI agreement that proposed regional standards for CAC and ASHP. If the EPA does in fact adopt regionally specific specifications, we support harmonizing with the DOE defined regions.
3. Additional performance metrics
 - a. NEEP strongly supports the addition of crucial performance metrics for Northern qualification.
 - b. HPSF is not always an accurate indicator of an ASHP's ability to deliver certain capacities in colder climates.
 - c. The addition of COP and capacity requirements tested at colder temperatures would be a potential way to better identify products capable of operating effectively and efficiently at temperatures typical of colder climates. We will likely have more specific feedback in this area during the next round of comment.
 - d. Vermont's efficiency programs require additional performance capabilities to qualify for incentives. See attached.
4. Effective date



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- a. It seems appropriate to align timing of the next criteria effective date with the new DOE standard.

Thank you for your consideration of these comments.

David Lis
Senior Manager
Northeast Energy Efficiency Partnerships