April 8, 2005

Rachel Schmeltz
ENERGY STAR Product Manager
Environmental Protection Agency
Ariel Rios Building, SW, MS 6202J
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Ms. Schmeltz:

The Air Conditioning Contractors of America (ACCA), the Air-Conditioning and Refrigeration Institute (ARI), and the undersigned members of the Consortium for Energy Efficiency (CEE) strongly urge EPA to create a two-part label for the CAC/ASHP specification that allows HVAC manufacturers to continue labeling equipment in the factory and using the ENERGY STAR brand in their marketing materials.

The current EPA proposal risks a reduction in the resource base to promote the brand, and the loss of a critical ally in efforts to promote energy-saving HVAC systems. The undersigned believe a two-part labeling scheme that conveys the importance to consumers of both high-efficiency equipment and a quality installation is both desirable and achievable. As envisioned, the label affixed to equipment in the factory (and used in manufacturer marketing materials) would convey that the equipment meets the performance requirements of the ENERGY STAR specification. Possible language for this label includes: “ENERGY STAR Qualified,” “ENERGY STAR Manufactured,” “ENERGY STAR Eligible,” “ENERGY STAR Capable,” or “ENERGY STAR Ready.” We believe EPA should allow manufacturers to continue using the ENERGY STAR logo in their marketing materials when specific language stating the importance of a quality installation accompanies that logo. For consumers to benefit, this language must be consistent with the requirements of the ENERGY STAR specification but remain simple, clear, and concise.

A second label with language such as “ENERGY STAR Installed” would be affixed (or presented to consumers in the form of a certificate) only when the installation is verified to have met all the requirements of the ENERGY STAR specification.

This approach will encourage manufacturers to continue their strong involvement in the ENERGY STAR program while providing a platform to educate consumers on the necessity to have the equipment installed according to EPA’s quality installation requirements.

Respectfully,

Air Conditioning Contractors of America
Air-Conditioning and Refrigeration Institute
Consortium for Energy Efficiency HVAC Committee

[Logos of ACCA, ARI, and CEE]
CEE Residential HVAC Committee “Supporting Organizations”

Alliance to Save Energy
Cape Light Compact
Connecticut Light and Power
Efficiency Vermont
Midwest Energy Efficiency Alliance
National Grid USA (Mass Electric, Nantucket Electric, Narragansett Electric)
New York State Energy Research and Development Authority
Northeast Energy Efficiency Partnership
NSTAR
Office of Clean Energy of the New Jersey Board of Public Utilities
Oregon Energy Trust
Pacific Gas & Electric
Pacificorp
Sacramento Municipal Utility District
San Diego Gas and Electric
Southern California Gas Company
Tacoma Power Energy Services
TXU Electric Delivery
Unitil
Western Massachusetts Electric Company