



February 20, 2011

1111 19th Street NW > Suite 402 > Washington, DC 20036  
t 202.872.5955 f 202.872.9354 www.aham.org

Via E-Mail

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

Re: ENERGY STAR Program Requirements Product Specification  
For Room Air Conditioners, Eligibility Criteria, Draft 3, Version 3.0

Dear Ms. Stevens:

On behalf of the Association of Home Appliance Manufacturers (AHAM), I would like to provide our comments on the ENERGY STAR Program Requirements Product Specification for Room Air Conditioners, Eligibility Criteria, Draft 3, Version 3.0. Please note that these comments address only the non-smart grid portion of Draft 3—AHAM will later submit comments regarding the smart grid proposals.

The Association of Home Appliance Manufacturers (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 the U.S. Environmental Protection Agency (EPA) and Department of Energy (DOE) in their efforts to provide incentives to manufacturers, retailers, and consumers for continual energy efficiency improvement. We continue to believe that EPA should ensure that room air conditioners with electromechanical controls are not exempt from qualification for ENERGY STAR because of the design requirements for the energy saver mode and the filter reminder. Those products can provide consumers with energy savings—the ENERGY STAR specification should not limit consumer choice. We thank EPA for making changes in Draft 3 in an effort to maintain consumer choice, but more is necessary in order to accomplish that goal.

## I. Definitions

EPA proposed a definition for “electromechanical,” and AHAM supports that proposed definition.

## II. Qualification Criteria

### A. Energy Efficiency Ratio (EER)

AHAM notes that the proposed EERs seem to be missing the  $\geq$  symbol in Tables 1, 2, and 3, which we assume was a typographical error. EPA should ensure that the symbols appear in any subsequent drafts and in the final specification.

### B. Energy Saver Mode

EPA proposes to require that the product have an “energy saver mode,” which may be consumer override-able. EPA proposes that products, excepting electromechanical RACs, shall default to energy saver mode each time the unit is turned on.

AHAM does not generally object to EPA including criteria for an energy saver mode, and supports the exception for electromechanical RACs which, as we explained in our comments on Draft 2, would be penalized by the requirement.

Consumer expectations may not be met by a unit that defaults to energy saver mode each time the unit is turned on regardless of whether the consumer overrode the mode the last time he or she turned on the unit. But, if ENERGY STAR maintains the requirement that to qualify for ENERGY STAR, a product, excepting electromechanical RACs, default to energy saver mode each time the unit is turned on, EPA should consider a couple of exceptions. First, in the event of a power failure or other event where the unit performs an auto-recovery, most RACs restart in the same mode the unit was in when the unit turned off (e.g., at the power failure). Most consumers would expect that the mode selected when the unit is turned on will remain selected when the unit restarts in this situation, and so EPA should clarify that the requirement that the unit default to energy save mode each time it is turned on does not apply to auto-recovery situations. Because events requiring auto-recovery are not frequent, such an exception would not significantly impact energy savings.

Similarly, some units have switches located behind a removable panel that could allow a consumer to more permanently override default settings, such as the energy saver mode. If a consumer is willing to make the effort to remove the panel in order to turn off the energy saver mode for a longer period of time, that consumer should be able to do so. Accordingly, EPA should allow an exception for switches that are concealed by a removable panel or require significant effort for the consumer to engage.

### C. Filter Reminder

EPA proposes to require that to qualify for ENERGY STAR, RACs, excepting electromechanical RACs, have a filter reminder that provides visual notification recommending the filter be checked, cleaned, or replaced, as applicable. AHAM supports the exception for electromechanical RACs because, as we commented in our comments on Draft 2, a filter reminder requirement would be virtually, if not totally, impossible for electromechanical products to meet, and would result in products that meet the energy efficiency criteria not being qualified for ENERGY STAR.

As with the energy saver mode, we expect some customers may want to permanently override the filter reminder. This is especially true for customers utilizing through-the-wall units in hotel applications. Accordingly, EPA should allow an exception for switches that are concealed by a removable panel or require significant effort for the consumer to engage.

### D. Significant Digits and Rounding

EPA proposed requirements for significant digits and rounding in part 3D of Draft 3 of the specification. The proposed language is an attempt to harmonize with DOE's regulatory requirements. AHAM agrees that requirements should be harmonized with DOE's regulatory requirements. But harmonization is not enough—EPA's requirements must be identical to DOE's requirements. It is illegal for manufacturers to make energy representations based on anything other than DOE's applicable test procedures and regulations. Accordingly, EPA need only state that qualification for ENERGY STAR must be based on the values reported to DOE in the manufacturer's certification report and appearing on the FTC EnergyGuide label. That approach will not only provide clarity and consistency for regulated parties, but also for consumers who will see the same EER on the EnergyGuide label and ENERGY STAR Qualified Product List. If EPA believes that clarification on significant digits and rounding are required, it should address that concern with DOE, and DOE should issue guidance if it determines guidance is necessary after consulting with stakeholders. EPA cannot unilaterally clarify DOE's regulations through an ENERGY STAR specification. Stating anything in addition to DOE's regulations may, intentionally or unintentionally, change the meaning of those regulations.

AHAM appreciates the opportunity to submit these comments on ENERGY STAR's proposal regarding the ENERGY STAR Program Requirements Product Specification for Room Air Conditioners, Eligibility Criteria, Draft 3, Version 3.0. We would be glad to discuss this matter further should you request.

Best Regards,



Jennifer Cleary  
Director, Regulatory Affairs