October 28, 2009

Dear ENERGY STAR® Light Commercial HVAC Partner or Other Interested Stakeholder:

The U.S. Environmental Protection Agency (EPA) welcomes your input on the attached Final Draft Version 2.0 ENERGY STAR Light Commercial HVAC specification. Stakeholders are encouraged to provide feedback on the Final Draft document to EPA by November 11, 2009. Please note that this is the final opportunity to provide input on the Version 2.0 specification before it is finalized.

This latest draft proposal reflects written comments received on the previous Draft 2 document, discussions during the August stakeholder conference call, and EPA’s analysis of the most recent Air-Conditioning, Heating, and Refrigeration Institute (AHRI) Directory of Certified Products in early September. Provided below are some of the key revisions made in this Final Draft Version 2.0 specification:

- The categories for central air conditioning (CAC) rated at 65,000 Btu/h and under 240,000 Btu/h have been further sub-categorized based on heating section type. Proposed EER and IEER levels for “all other” (i.e., gas) heating section type equipment are set 0.2 lower than proposed EER and IEER requirements for electric resistance equipment.

- Tier 1 EER and IEER levels for CAC equipment rated at 65,000 Btu/h and under 135,000 Btu/h have been revised to mirror the levels proposed for CAC equipment rated at 135,000 Btu/h and under 240,000 Btu/h.

- Tier 1 EER and IEER levels for ASHP equipment rated at 65,000 Btu/h and under 135,000 Btu/h have been decreased to 11.3 EER and 11.4 IEER, respectively.

- EPA has added Variable Refrigerant Flow (VRF) multi-split systems to the specification along with the supporting test procedure: AHRI Standard 1230 – Performance Rating of Variable Refrigerant Flow (VRF) Multi-Split Air-Conditioning and Heat Pump Equipment, which was recently approved by the AHRI Standards Committee.

- Air-source heat pumps (ASHP) with a gas heating element (i.e., “all other” classification) greater than 65,000 Btu/h are not currently available in the marketplace. Therefore, performance levels proposed for ASHP greater than 65,000 Btu/h are applicable only to electric resistance heat type equipment. EPA will consider adding this category of products during the Tier 2 revision process.

- EPA will define Tier 2 performance levels for split system CAC/ASHP equipment below 65,000 Btu/h for inclusion in a Tier 2 specification. EPA will review performance data for this product category beginning in 2010 and determine efficiency requirements that represent the top 20-25% of available models for Tier 2.
More details regarding EPA’s rationale for proposing these requirements are included in note boxes found throughout the document.

**Effective Dates**

EPA’s goal is to finalize the Version 2.0 specification no later than November 25, 2009 and propose a new Tier 1 specification effective date of May 1, 2010. EPA has extended the Tier 1 effective date to provide manufacturers additional time to transition product literature and other ENERGY STAR materials prior to the effective date.

Please note that after October 31, 2009, manufacturers may no longer join the program or report qualified LCHVAC products under the existing Version 1.0 specification. During this two month period before the new federal minimum efficiency standard takes effect, EPA will transition web-related information to the Version 2.0 specification. Partners, however, may continue to use the ENERGY STAR mark on products and in promotional materials for models qualified under Version 1.0 prior to October 31st.

Once the Version 2.0 specification takes effect on May 1, 2010, all ENERGY STAR qualified light commercial HVAC models will be required to meet the new Version 2.0 Tier 1 levels to remain ENERGY STAR qualified. Models that were initially qualified under Version 1.0 that do not meet the Version 2.0 Tier 1 requirements will be removed from the ENERGY STAR Web site, and manufacturers must cease using the ENERGY STAR mark on equipment manufactured on or after May 1, 2010 on products that do not meet the Version 2.0 requirements. Models that are re-designed and re-tested to meet the new Version 2.0 Tier 1 requirements must be submitted to EPA using a new Qualified Product Information (QPI) form.

EPA has revised the effective date for Tier 2 requirements to July 1, 2011. Once IEER data are available beginning in 2010, EPA plans to conduct a review to determine appropriate Tier 2 performance levels as quickly as possible. EPA’s goal is to finalize Tier 2 levels by October 2010 and provide manufacturers with time to transition product literature and other ENERGY STAR materials prior to the Tier 2 effective date.

**Comment Submittal**

EPA will consider all comments received on the Final Draft Version 2.0 specification no later than November 11, 2009. Comments should be directed to Christina Chang, ICF International, at cchang@icfi.com. All stakeholder comments on the Final Draft document will be posted to the ENERGY STAR Product Development Web site unless otherwise requested.

To track EPA’s progress in revising the ENERGY STAR specification for Light Commercial HVAC, visit the Product Development Web site at: www.energystar.gov/revisedspecs.

Thank you for taking the time to review this draft specification. Please contact me at (202) 343-9123 or Ryan.Steven@epa.gov with any questions, comments, or concerns.

Sincerely,

Steve Ryan
ENERGY STAR for Commercial HVAC Equipment