

**Comments on Draft 1
Trane, Inc
Submitted on 01/29/09**

- Agrees that HVAC equipment with cooling capacities larger than 250,000 Btu/h represents a sizeable portion of the market.
- Suggests the following recommended performance levels:

Equipment Type	Size Category	Specification	Test Procedure
Air-Source AC (3-phase, single package)	<65,000 Btu/h	≥15 SEER*; ≥ 12 EER	AHRI 210/240
Air-Source AC	≥65,000 Btu/h - <135,000 Btu/h	≥12.2 EER; ≥13.5 IEER	AHRI 340/360
Air-Source AC	≥135,000 Btu/h - <240,000 Btu/h	≥12 EER; ≥13 IEER	AHRI 340/360

*15 SEER represents a 15% increase from 13 SEER. The previous ENERGY STAR minimum of 13 SEER was a 30% increase over the previous federal minimum.

- These performance levels suggested above are technologically feasible. The technology is “off the shelf” and can be replicated throughout the industry.