



May 16, 2014

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

Re: Draft 1 Version 5.0 ENERGY STAR® Central Air Conditioner and Air-Source Heat Pump
(CAC/ASHP) Specification

SUBMITTED VIA CAC-ASHP@ENERGYSTAR.GOV

Dear Ms. Daken:

Goodman Global, Inc. ("Goodman") submits the comments below in response to the U.S. Environmental Protection Agency ("EPA") email sent on April 17, 2014 announcing Draft 1 of Version 5.0 for the ENERGY STAR® Program Requirements, Product Specification for Air Source Heat Pump and Central Air Conditioner Equipment. Goodman manufactures residential and light commercial heating and cooling equipment. Our products are sold and installed by contractors in every state. Goodman is a member of Daikin group, the largest HVAC manufacturer in the world. Goodman appreciates the opportunity to comment upon the NOPR.

As a member of the Air-Conditioning, Heating and Refrigeration Institute ("AHRI"), we fully endorse the comments being submitted by AHRI. In our comments we reiterate some of the points made in the AHRI comments we feel are most urgent to be addressed. We appreciate very much that the EPA listens to the input of all stakeholders. It is evident, in developing this ENERGY STAR® Program Requirement proposal for Version 5.0, as well as other EPA rulemakings, that the EPA is willing to listen to the concerns voiced by interested parties. We have no concerns with the proposed definitions or scope of the program requirements.

I. National versus Regional Criteria

As was voiced by many manufacturers during the stakeholder webinar on May 5, 2014, we are concerned with the increased level of requirements that regional ENERGY STAR® criteria would bring to consumers and to the industry. A simpler national criteria will make participation more attractive to manufacturers and easier to work with for distributors and contractors, and easier to understand for consumers. We concur with the AHRI proposed values of 12.5 EER, 15.0 SEER and 8.5 HSPF for Split System Products and 12.0 EER, 15.0 SEER and 8.2 HSPF for Single Package Products as noted in Table 1 of AHRI's comments.

II. Align with CEE

The EPA ENERGY STAR® program has an excellent history of aligning with the CEE tier levels and we find great value in such alignment. AHRI comments succinctly note that when there are too many levels to attract consumers to a higher efficiency, somewhere along the line comprises will be made. The CEE and ENERGY STAR® target levels do effect product design and development; keeping those levels aligned and minimized will help manufacturers find the "sweet spot" for designs to enable offering the most cost effective product to consumers.

III. Minimize Labeling Requirements

We concur that providing the ENERGY STAR® brand logo on the AHRI Certificate of product ratings would be an ideal solution. This form of labeling would further address EPA's concern of more clearly communicating which combinations of split systems meet ENERGY STAR® performance criteria. The reality is very few consumers actually see the product they are purchasing before it is actually installed (and a large percentage of outdoor products are hidden from view once installed by bushes, fences or other barriers). At most, the consumer may typically see sales and marketing literature if they make the product selection (as often the product selection is made by the installing contractor).

IV. Effective Date

Industry stakeholders have endured significant confusion over the past few years due in large part to the uncertainty of the litigation of the minimum energy conservation standards which was just settled last month. As AHRI has noted, we believe it is best to set the effective date for new ENERGY STAR® program requirements to align with when DOE will enforce the regional standards for products manufactured prior to January 1, 2015. Should EPA not wish to consider the 18-month period, we believe a 12-month period would be more appropriate than a 6-month period before implementation of new requirements.

IV. Test Requirements

Goodman would like to take this opportunity to encourage EPA to return to accepting the AHRI Certification Program in its entirety without having additional requirements. We note that recently AHRI has significantly increased the consequences on manufacturers for improper ratings (as can be noted by the addition of Double Selection, Probation and Penalty Modes outlined in the General Operations Manual, Section 9.15). Further requirements beyond AHRI's already strict process will deter manufacturer interest in participation in the ENERGY STAR® program.

Goodman genuinely appreciates the opportunity to provide these comments. If you have any questions regarding this submission, please do not hesitate to contact me at the contact information below, or Rusty Tharp at rusty.tharp@goodmanmfg.com or 713/263-5906.

Sincerely,

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