

May 16, 2014

Ms. Abigail Daken
US EPA
ENERGY STAR

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

Ingersoll Rand Residential HVAC, manufacturer of Trane, American Standard, and Ameristar residential heating and air conditioning products, appreciates the opportunity to offer the following comments on the EPA's draft on the version 5.0 specification for central air conditioners and heat pumps.

1. Regional versus National Levels

We believe that having national, non-regional, Energy Star levels is best for consumers and - manufacturers. This reduces confusion for consumers, simplifies product families for - manufacturers, and provides energy savings for the country. -

2. Alignment with CEE Tiers

EnergyStar levels should align with CEE Efficiency Tiers. This is already in place for Most Efficient and needs to be maintained for the base EnergyStar level. The proposal would create essentially 5 tiers of efficiency levels. This is too complex, and will not maximize demand for EnergyStar products

3. IR Proposed Levels

We recommend the following national levels for residential AC and HP's.

Split AC: 15.0 SEER / 12.5 EER
Package AC: 15.0 SEER / 12.0 EER

Split HP: 15.0 SEER / 12.0 EER / 8.5 HSPF
Package HP: 15.0 SEER / 12.0 EER / 8.2 HSPF

These levels align EnergyStar with CEE tiers. It is important that the EER levels are below 13 to insure full product lines of affordable products can be developed. The 13 EER level should be reserved for the top tier.

It is also important to be aware that many Southern US applications will be with a non-condensing furnace with a high efficiency blower system, since this is a good economic choice for the homeowner. Thus, the best choice in these regions will not be with an EnergyStar furnace.

4. **Labeling**

Providing a downloadable certificate with the EnergyStar logo is a good solution for identifying systems that are EnergyStar qualified.

5. **Certification / Verification**

The EnergyStar program has made good progress in streamlining the certification and verification requirements. We believe that more could be done. We would be happy to discuss the certification and verification issues further as there are several issues. Two significant issues are:

- The 10 day time period to supply additional samples after a verification test failure adjusted is not feasible for some products.
- The certification procedure for Most Efficient products needs to use the same procedures as a standard Energy Star product

We appreciate this opportunity to supply our comment on this issue. If you have any questions, please feel free to contact me.

Respectfully,

James T. VerShaw
Chief Engineer
jim.vershaw@irco.com