



NRDC Comments on EPA ENERGY STAR's Framework Document for the Version 5.0 Specification for Central Air-Conditioners and Air-Source Heat Pumps

August 2, 2013

On behalf of the Natural Resources Defense Council (NRDC) and its more than 1.3 million members and online activists we respectfully submit the following comments on the EPA ENERGY STAR's Framework Document for the Version 5.0 Specification for Central Air-Conditioners (CAC) and Air-Source Heat Pumps (HP).

**NRDC supports EPA's decision to update the specification for CAC and HP.** The current specification has now been in effect for over four years and will be very similar (the same in some cases) to the updated DOE standards that take effect on January 1, 2015. Furthermore, the qualified products in the Energy Star and AHRI databases indicate the availability of much higher efficiency CAC and HP across all product types (split, mini/multi-split, and packaged) than the current Energy Star specification. Based on this available data, we recommend that EPA consider a revised specification that corresponds to a minimum of CEE Tier 3 or higher efficiency.

**NRDC agrees that EPA should evaluate a regional specification.** Due to the range of outdoor air temperatures and air conditioning loads across the US, higher SEER levels may be cost-justified in some regions than in others. For this reason, we encourage EPA to evaluate regional values for SEER and to choose the highest SEER values that are cost-effective by region. However, we recommend that EPA consider a single national requirement for the EER rating. The need for high efficiency at peak load is the same both in regions with more moderate temperatures and occasional days with temperatures exceeding 95° F and in regions where these temperatures are a daily occurrence. This is because peak-load efficiency affects the need for peak generation capacity.

We agree with EPA that the regions for the specification should be aligned with those in the DOE standard to avoid confusion. We also support EPA's suggestion of using a downloadable certificate that would show compliance based on the split system components actually installed.

**NRDC supports the inclusion of a requirement for diagnostic and communications capability.** We agree that having auto-diagnostics built in, such as reminding the user to change the filter or alerting the user of necessary maintenance, would increase field energy savings and would not likely add significant additional cost. We encourage EPA to further consider requiring auto-diagnostic capabilities as part of the specification.

Thank you for the opportunity to submit these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Meg Waltner', with a long horizontal flourish extending to the right.

Meg Waltner  
Manager, Building Energy Policy