

May 15, 2014

Ms. Abigail Daken
U.S. Environmental Protection Agency (EPA)
ENERGY STAR HVAC Program

RE: NORDYNE Comments on Draft 1 Version 5.0 Energy Star Central Air Conditioner and Air Source Heat Pump (CAC/ASHP) Specification

Dear Ms. Daken:

NORDYNE is pleased to submit comments pertaining to the EPA ENERGY STAR specification referenced above. NORDYNE designs and manufactures a full line of heating and cooling equipment for residential and light commercial applications, and is proud to include among our many ENERGY STAR listed products several in the "Most Efficient" category for central air conditioners and heat pumps.

However, we have a number of concerns regarding the Version 5.0 Draft Specification. These can be categorized into the following areas:

- ENERGY STAR should create national standards only. We do not favor a regional approach for ENERGY STAR products. The complexity in determining compliance and producing products that comply with multiple tiers for DOE, ENERGY STAR, CEE is shown in the table below. This makes it difficult to participate in all tiers, and will lead to manufacturers dropping particular classes of products, or dropping out of the program altogether. Manufacturers have a limited amount of resources and also must make decisions on the number of models they can keep in inventory to service multiple markets and efficiency levels.

	DOE Reg. North			DOE Reg. South			DOE Reg. West			ENERGY STAR V5.0			CEE Tier 1			CEE Tier 2			CEE Tier 3		
	SEER	EER	HSPF	SEER	EER	HSPF	SEER	EER	HSPF	SEER	EER	HSPF	SEER	EER	HSPF	SEER	EER	HSPF	SEER	EER	HSPF
Split A/C	13.0	n/a	n/a	14.0	n/a	n/a	14.0	12.2-11.7	n/a	14.5	12.0	n/a	14.5	12.0	n/a	15.0	12.5	n/a	16.0	13.0	n/a
Split HP	14.0	n/a	8.2	14.0	n/a	8.2	14.0	14.0	8.2	15.5	12.5	8.6	14.5	12.0	8.5	15.0	12.5	8.5	n/a	n/a	n/a
Packaged A/C	14.0	n/a	n/a	14.0	n/a	n/a	14.0	11.0	n/a	15.5	12.5	n/a	14.0	11.0	n/a	14.0	12.0	n/a	n/a	n/a	n/a
Packaged HP	14.0	n/a	8.0	14.0	n/a	8.0	14.0	n/a	8.0	14.5	12.0	8.3	14.0	11.0	8.0	14.0	12.0	8.0	n/a	n/a	n/a

We agree with AHRI's proposal for national requirements at 15.0, 12.5, and 8.5 for all split systems and 15.0, 12.0, and 8.2 for all single packaged systems as national minimum levels.

- We applaud the EPA's efforts earlier this year to more closely align it's certification requirements with AHRI's certification program relative to submitting new models. However, the additional testing burden still needs to be lifted such that EPA's program aligns with AHRI without any additional burdens, as it was before the new requirements came into affect. We believe you would then see a return to higher levels of participation, rather than the less than 5% rate today, which is based on models that meet the performance criteria but are not listed.

- NORDYNE believes the implementation date should be no sooner than January 1, 2016. Manufacturers, distributors, and contractors will already have enough challenges in developing and distributing products that meet regional standards in 2015. To change the ENERGY STAR specifications prior to that might mean a further decrease in participation rates as manufacturers do not have the resources to shift from projects being worked on to meet the DOE minimums and ENERGY STAR at the same time. This would give us time in 2015 to shift resources from the federal DOE minimums to ENERGY STAR projects.
- NORDYNE believes manufacturers who participate in AHRI's certification program should not be subject to any additional labeling requirements. AHRI has the capability of furnishing the ENERGY STAR mark within the corresponding AHRI certificate for qualifying ratings.
- We also continue to believe (as we have advocated for many years) that the EPA, in coordination with CEE, should develop separate specifications that take advantage of the capabilities of the peak load shedding and demand response capabilities of two-stage and modulating equipment instead of focusing on strictly raising the steady state EER. We have nearly reached the limit of what can be achieved with existing technology at any kind of reasonable cost benefit ratio. However, much higher EER's (and lower power consumption) can be obtained with modulating equipment operating at part load. The technology exists to control and manage this at either the end user or utility level.

While NORDYNE believes in the value of the ENERGY STAR brand and the benefits it offers, we continue to evaluate the benefits versus the burdens on an individual product line basis. And, like many other manufacturers, we have made decisions to reduce the percentage of products listed that qualify, and do not wish to see this trend continue which we believe will happen with the implementation of the draft Version 5.0 specifications as currently proposed.

We thank you for this opportunity to comment and your consideration of our comments in this matter. Please, and please do not hesitate to call or write the undersigned if we can be of any further assistance in this matter.

Sincerely,



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