

July 31, 2014

Abigail Daken
ENERGY STAR
1310 L Street, NW
MC 6202J
Washington, DC 20006
daken.abigail@epa.gov

Dear Ms. Daken:

As an ENERGY STAR award recipient the past six years, Panasonic is proud to actively support the ENERGY STAR program initiatives including the proposed upgrade to the current Ventilation Fans criteria. We believe the ENERGY STAR Ventilating Fans version 4.0 represents an important step forward and is consistent with Panasonic's desire to offer the industry's most efficient products meet or exceed all ENERGY STAR Requirements.

Panasonic welcomes the opportunity to comment on EPA's proposed changes the ENERGY STAR Ventilating spec draft 1, version 4.0. Our comments follow the specification's document in order and are detailed below.

Multispeed Efficacy Levels – 3.b.; Lines 93 – 102: Panasonic endorses the clarification that multispeed fans must meet ENERGY STAR airflow efficacy levels of 70% at 0.25 WG compared to 0.10 WG. It is acknowledged that 0.25 WG is the best representation of actual installed performance levels and Panasonic agrees that ENERGY STAR certified fans should maintain customer satisfaction levels once ventilation products are installed and used.

Re-alignment of Airflow Bins – Table; Lines 125 - 130: Panasonic acknowledges the difficulty of attaining efficacy levels with an AC Motor at low speeds, specifically airflow less than 50 CFM. Therefore, we accept the concept of the revised Airflow Bins under the Bathroom and Utility Room categories which eliminates any ENERGY STAR requirements for fans with airflow under 50 CFM.

Airflow Efficacy Levels – Table; Lines 144 - 153: Panasonic agrees with the proposed increase in efficacy levels for the Bathroom, Utility Room and In-Line Fan airflow bins at all speeds noting that the majority of bathroom and utility fans for residential use are under 200 CFM.

Sone Levels – Table; Lines 157 – 160: Panasonic concurs with the decreased Sone requirement for Airflow Bin 90 – 200 CFM from 3.0 Sones to 2.0 Sones.

Reporting of Sone Levels at 0.25 WG; C.a.2, Lines 161 – 166, 277: Panasonic acknowledges the increased cost to manufacturers to test noise levels at two points but would like to propose a phasing-in of requiring Sone levels to be reported at 0.25 WG three years after the date of enacting the ENERGY STAR Ventilating Fans version 4.0 specification. As noted, the industry accepts as a substitute measurements of 0.25 to be indicative of actual installed ventilation products. Therefore, if noise levels are of concern to

ENERGY STAR Ventilation and ENERGY STAR for Homes, logically, it would be important for ENERGY STAR certified products to perform consistently to consumers' expectations. A transparent way to accomplish comparison of ENERGY STAR products would be to indicate probable noise levels based on the anticipated installation.

Reporting of Watts at 0.25 WG; C.a.2, Lines 163 – 165, 277: In the notes section of Proposed Changes V 4.0, ENERGY STAR has requested information from manufacturers on the reporting of Watts at 0.25 WG. It should be noted that reporting of Watts during testing at HVI/ENERGY STAR's Official Testing Agency, TEES, automatically gives Watts at 0.25 WG. While increased static pressure has a varied effect on different fans, Panasonic has not noted a great variance, or increase, in the power consumption when faced with static pressure increases from 0.10 to 0.25 WG. However, for some architects and engineers that are working to limit energy consumption might like to know what the anticipated energy consumption might be during the occupancy of a project. Therefore, Panasonic similarly proposes to phase-in reporting of Watts at 0.25 WG in ESTAR Qualified Products. A phase-in date of three years from enacting initial V 4.0 changes should allow time for anticipated marketing and collateral material changes for manufacturers since, again, the numbers to reflect Watts at ten points of data, including 0.10 and 0.25 WG, are already given during testing at TEES.

Proposed ENERGY STAR Lighting Requirement Changes; B (2), Lines 178 - 184: Panasonic heartily endorses the proposed option to meet ENERGY STAR luminaires requirements as it relates to Bathroom and Utility Fans. Panasonic, and several ventilation fan manufacturers, have had a difficult time working with limited Third Party Certified bodies to approve lighting features with ventilation products. This is ironic since, in many cases, if we are getting a fan product certified to ENERGY STAR Requirements we are also including an ENERGY STAR Luminaire. Panasonic welcomes this change to EPA's Luminaires Requirements.

Proposed ESTAR Efficacy at 0.25 WG Requirement Changes; D, Lines 209 - 217: Panasonic agrees with the increase in ENERGY STAR efficacy levels at 0.25 compared to 0.10 WG from 60% to 70%. This upgrade would affect only fans with speeds from 50 – 89 CFM which would make the ENERGY STAR efficacy levels consistent for all Bath and Utility Fans.

Thank you for the opportunity to comment on EPA's proposal and for the thorough presentation for ENERGY STAR Ventilating Fans draft 1, version 4.0. Please let me know should you have any questions about our comments.

Sincerely,

Mark Sharp
Group Manager

cc: Jim Shelton
Takeshi Yasuda
Don Stevens
Ted Cater