



May 31, 2012

1111 19th Street NW > Suite 402 > Washington, DC 20036  
t 202.872.5955 f 202.872.9354 www.aham.org

Via E-Mail

Amanda Stevens  
U.S. Environmental Protection Agency  
ENERGY STAR Appliance Program  
appliances@energystar.gov

Re: ENERGY STAR Program Requirements Product Specification  
For Room Air Conditioners, Eligibility Criteria, Final Draft, Version 3.0

Dear Ms. Stevens:

On behalf of the Association of Home Appliance Manufacturers (AHAM), I would like to provide our comments on the ENERGY STAR Program Requirements Product Specification for Room Air Conditioners, Eligibility Criteria, Final Draft, Version 3.0.

The Association of Home Appliance Manufacturers (AHAM) represents manufacturers of major, portable and floor care home appliances, and suppliers to the industry. AHAM's membership includes over 150 companies throughout the world. In the U.S., AHAM members employ tens of thousands of people and produce more than 95% of the household appliances shipped for sale. The factory shipment value of these products is more than \$30 billion annually. The home appliance industry, through its products and innovation, is essential to U.S. consumer lifestyle, health, safety and convenience. Through its technology, employees and productivity, the industry contributes significantly to U.S. jobs and economic security. Home appliances also are a success story in terms of energy efficiency and environmental protection. New appliances often represent the most effective choice a consumer can make to reduce home energy use and costs.

AHAM supports the U.S Environmental Protection Agency (EPA) and Department of Energy (DOE) in their efforts to provide incentives to manufacturers, retailers, and consumers for continual energy efficiency improvement. AHAM thanks EPA for taking typical room air conditioner production schedules into account by revising the effective date to October 1, 2013. AHAM also appreciates that EPA made changes to the energy saver mode and filter reminder requirements. As work on the connected criteria is ongoing, AHAM understands why EPA temporarily removed those sections, and fully supports EPA's commitment to integrate those sections in Version 3.0 once they are final.

## I. **Qualification Criteria**

### A. Energy Efficiency Ratio (EER)

AHAM notes that the final draft EERs still seem to be missing the  $\geq$  symbol in Tables 1, 2, and 3, which we assume was a typographical error. EPA should ensure that the symbols appear in the final specification.

### B. Energy Saver Mode

EPA proposes to require that the product have an “energy saver mode,” which may be consumer override-able. EPA proposes that products, excepting electromechanical RACs, shall ship with energy saver mode enabled as the default setting and shall default to energy saver mode each time the unit is turned on. EPA also proposes that products are not required to default to energy saver mode upon restoration of power after an outage. In addition, EPA provides an exception for through the wall units by allowing them to include an installer accessible setting that disables energy saver mode functionality. This exception requires that access to the setting require the use of tool(s), and removal of a panel, or the like.

AHAM does not generally object to EPA including criteria for an energy saver mode, and continues to support the exception for electromechanical RACs. AHAM continues to believe, however, that consumer expectations may not be met by a unit that defaults to energy saver mode each time the unit is turned on regardless of whether the consumer overrode the mode the last time he or she turned on the unit. In any case, because EPA has decided to maintain that requirement in this final draft, we thank EPA for also including an exception for restorations of power after an outage. The exception, however, is a little bit vague as written—in particular, the term “outage” could be open to interpretation. AHAM thus suggests one slight modification in redline: “However, products are not required to default to Energy Saver Mode upon restoration of power after an outage of power to the unit.”

We also thank EPA for including an exception for through the wall units, and, though we think it could be extended to all room air conditioners, AHAM supports the proposed exception.

### C. Filter Reminder

EPA proposes to require that to qualify for ENERGY STAR, RACs, excepting electromechanical RACs, have a filter reminder that provides visual notification recommending the filter be checked, cleaned, or replaced, as applicable. EPA also proposes that through the wall units may include an installer accessible setting that disables filter reminder functionality. Access to the setting shall require the use of tool(s), and removal of a panel, or the like.

As with the energy saver mode, we thank EPA for including an exception to the filter reminder requirement for through the wall units and, though we believe it should be extended to all room air conditioners, AHAM supports that exception.

#### D. Significant Digits and Rounding

EPA again proposed requirements for significant digits and rounding in part 3.E of the specification. The proposed language is an attempt to harmonize with DOE's regulatory requirements. AHAM agrees that requirements should be harmonized with DOE's regulatory requirements. But harmonization is not enough—EPA's requirements must be identical to DOE's requirements. It is illegal for manufacturers to make energy representations based on anything other than DOE's applicable test procedures and regulations. Accordingly, EPA need only state that qualification for ENERGY STAR must be based on the values reported to DOE in the manufacturer's certification report and appearing on the FTC EnergyGuide label. That approach will not only provide clarity and consistency for regulated parties, but also for consumers who will see the same EER on the EnergyGuide label and ENERGY STAR Qualified Product List. If EPA believes that clarification on significant digits and rounding are required, it should address that concern with DOE, and DOE should issue guidance if it determines guidance is necessary after consulting with stakeholders. EPA cannot unilaterally clarify DOE's regulations through an ENERGY STAR specification. Stating anything in addition to DOE's regulations may, intentionally or unintentionally, change the meaning of those regulations.

#### II. **Effective Date**


EPA proposes an effective date of October 1, 2013. EPA revised this effective date to account for the room air conditioner production schedule. AHAM strongly supports this change and thanks EPA for taking the normal production schedule into account.

#### III. **Connected Criteria**

EPA notes that it plans to continue work with stakeholders in the coming months on the connected sections and will integrate the connected criteria into the Version 3.0 criteria once they are final. AHAM looks forward to continuing to work with EPA and DOE on the connected criteria and test procedure and fully supports the re-integration of the connected criteria into the Version 3.0 criteria as soon as possible once they are final.

AHAM appreciates the opportunity to submit these comments on ENERGY STAR's proposal regarding the ENERGY STAR Program Requirements Product Specification for Room Air Conditioners, Eligibility Criteria, Final Draft, Version 3.0. We would be glad to discuss this matter further should you request.

Best Regards,



Jennifer Cleary  
Director, Regulatory Affairs