

July 22, 2005

Mrs. Rachel Schmeltz
Energy Star Program Manager
Environmental Protection Agency
Ariel Rios Building, SW, MS 6202J
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Mrs. Schmeltz:

The Air-Conditioning and Refrigeration Institute (ARI) appreciates the opportunity to provide comments on the Final Draft Energy Star Central Air Conditioner and Air Source Heat Pumps specifications.

ARI is a North American trade association representing the manufacturers of over 90% of U.S. produced air conditioning and commercial refrigeration equipment. ARI represents a domestic industry of approximately 200 air conditioning and refrigeration companies, employing approximately 150,000 men and women in the United States. The total value of member shipments by these companies is over \$30 billion annually.

ARI fully supports EPA's proposed changes to the final draft at the exception of the energy efficiency specification for split systems. We believe that the decision to raise the energy efficiency ratio (EER) to 12 is unjustified, unwarranted, and is counter to the main objective of Energy Star program, which is to save energy and minimize greenhouse gas emissions.

We understand that EPA's decision to raise the EER by half a point, from 11.5 to 12, was based solely on the belief that products meeting the specification are available in sufficient numbers. No consideration was given to energy savings and reduction in greenhouse gas emissions. While one would first be inclined to believe that a half point EER would have little or no impact on the number of qualified models and the potential energy savings, the reality, when looking at the ARI directory, is very different. Raising the EER from 11.5 to 12 disqualifies 11% of air conditioner models and 38% of heat pump models. At the most popular cooling capacity (i.e.; 3 tons), the percentage of disqualified models is even greater -- 15% for air conditioners and 57% for heat pumps. In other words, at 12 EER, there are 15% and 57% fewer 3-ton air conditioner and heat pump models respectively that would otherwise qualify as Energy Star products if the EER is at 11.5.

The reduction in the number of qualified models at 12 EER has a negative impact on energy savings and greenhouse gas emissions. It is well established (and reaffirmed by the Department of Energy during the last rulemaking on residential central air conditioners) that SEER (and not EER) is the appropriate energy efficiency descriptor that should be used to determine the energy consumption of residential central air conditioners and heat pumps. Given that at 12 EER fewer models will qualify, it is clear that the latest proposal from EPA will result in less energy savings and more greenhouse gas emissions.

In addition, EPA is obligated to look at the cost effectiveness of the proposed specification to ensure that consumers buying Energy Star products recover the highest cost of the equipment in a relatively short period of time. It has been well documented in the technical literature that increasing the EER of residential central air conditioners and heat pumps comes at a greater expense than increasing SEER. At 14 SEER and 12 EER, most systems incorporate a variable speed indoor blower, which implies that many air conditioners in retrofit installations will also require new furnaces. This additional cost will in most cases discourage consumers from buying an Energy Star product. At 14 SEER/11.5 EER the use of variable indoor speed blower is less prevalent and the cost to retrofit will be more reasonable.

In summary, we urge EPA to adopt an 11.5 EER for split systems. At this EER level, the equipment is more affordable and the number of qualified models will significantly increase resulting in more energy savings and less greenhouse gas emissions. We appreciate the opportunity to submit these comments. If you have any questions regarding this submission, please feel free to contact me.

Sincerely,



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