



Air Conditioning Contractors of America

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2800 Shirlington Road · Arlington, VA 22206 · (703) 824-8865 · Fax: (703) 575-9147

Rachel Schmeltz  
ENERGY STAR Program Manager  
U.S. Environmental Protection Agency  
MS-6202J  
1200 Pennsylvania Ave. NW  
Washington, DC 20460

8 April 2005

**Ref: 28 Jan 2005 DRAFT 1 (Energy Star Program Requirements for ASHPs and CACs)**

Dear Ms. Schmeltz,

The Air Conditioning Contractors of America (ACCA) is pleased to submit these comments on behalf of the nearly 5,000 member companies of our organization

For over 50 years ACCA has represented the technical, educational and policy interests of the men and women who design, install and maintain indoor environmental systems for residential and commercial/industrial applications. The vast majority of our members are small, family-owned businesses across the fifty states.

ACCA is providing comments and specific recommendation in three areas concerning the Energy Star Program requirements for ASHPs and CACs:

**1). ENERGY STAR LABELING**

ACCA recommends that EPA creates a two-part label for HVAC equipment that allows HVAC manufacturers to continue labeling equipment in the factory and using the Energy Star™ brand in their marketing materials.

The current EPA proposal risks a reduction in the resource base to promote the brand, and the loss of a critical ally in efforts to promote energy-saving HVAC systems. A two-part labeling scheme conveys the importance to consumers of both high-efficiency equipment and a quality installation is both desirable and achievable. As envisioned, the label affixed to equipment in the factory (and used in manufacturer marketing materials) would convey that the equipment meets the performance requirements of the Energy Star specification. Possible language for this label includes: "Energy Star Qualified", "Energy Star Manufactured," "Energy Star Eligible," "Energy Star Capable," or "Energy Star Ready." EPA should allow manufacturers to continue using the Energy Star logo in their marketing materials when specific language stating the importance of a quality installation accompanies that logo. For consumers to benefit, this language must be consistent with the requirements of the Energy Star specification but remain simple, clear, and concise.

A second label with language such as "Energy Star Installed" would be affixed (or presented to consumers in the form of a certificate) when the installation is verified to have met the requirements of the Energy Star specification. Whether such verification can be ascertained by the contractor at time of installation or requires a subsequent third-party verification visit (yet another intrusion on the consumer and a coordination/cost issue) is yet to be determined. ACCA is currently working with HVAC contractors, HVAC OEMs, utilities, as well as industry stakeholder groups to identify appropriate verification procedures and encourages EPA to adopt any consensus items that emerge from this collaboration.

This approach will encourage manufacturers to continue their strong involvement in the Energy Star program while providing a platform to educate consumers on the necessity to have the equipment installed according to EPA's quality installation requirements.

2). **INCLUSION OF DUCT REQUIREMENTS IN THE “QUALITY INSTALLATION”**

ACCA commends EPA in recognizing that installation is a critical component (and in many instances, more critical) to ensuring energy savings is actually realized. It is generally recognized that many homeowners would be far better off with a lower-SEER unit properly installed than with a higher-SEER unit inadequately installed (from energy consumption and comfort standpoints). Obviously, a properly-installed, high-SEER system would save the most energy. Albeit, it should be recognized that in some instances the simple payback for the increased costs of such a system, in varying geographical regions (especially northern climates), may be beyond the functional life of the system.

To achieve equipment design efficiency, it is indeed important that the components be installed per manufacturers' instructions/guidelines. This includes ensuring that correctly-sized (per ACCA/ANSI Manual J<sup>®</sup>, Eighth Edition and ACCA/ANSI Manual S<sup>®</sup>) and properly-matched components (per the CEE Directory of ARI-Verified Equipment) are installed with the correct refrigerant charge and the correct airflow over the coil. It is indeed valuable that these elements are included in the Energy Star proposal. However, this is the low-hanging fruit. Numerous studies indicate that 20%, 30%, 40% – and sometimes more – duct leakage occurs (and often in new homes with brand new duct systems). Duct leakage, especially when the ducts are located in unconditioned spaces, has considerable greater energy performance impacts (as well as comfort implications) on the HVAC system than do refrigerant charge and coil airflow variances.

ACCA encourages EPA to include proper duct design (per ACCA/ANSI Manual D<sup>®</sup>) and duct tightness / integrity in the Energy Star program. ACCA recognizes that a transition period is needed to (1) secure consensus on the appropriate duct verification/testing/sealing protocols, (2) for the contracting community to obtain appropriate duct installation/testing/sealing equipment, and (3) for HVAC technicians to become trained in the proper use of the protocols/equipment/procedures. As such, ACCA RECOMMENDS that a duct performance requirement be included in the Energy Star specification effective January 2008.

As noted earlier, ACCA is currently working with HVAC contractors, HVAC OEMs, utilities, as well as industry stakeholder groups to identify appropriate installation/verification procedures and encourages EPA to adopt any consensus items that emerge from this collaboration.

3). **SIX-MONTH EQUIPMENT TRANSITION PERIOD**

ACCA RECOMMENDS that EPA explicitly state in the specification that 13/12-SEER equipment manufactured before the proposed Energy Star effective date (i.e., 23 January 2006), that meets today's Energy Star requirements, is not to be represented as "Energy Star" after 23 July 2006. This six-month transition period will allow the supply side a reasonable amount of time to sell remaining inventory that may have been labeled Energy Star, and will also acknowledge that some 13/12-SEER equipment with pre-existing Energy Star labels will still be available in the market in early-2006. This approach would be consistent with how Energy Star transitioned to a new federal standard for clothes washers in 2004. This approach will also allow contractors to follow through on equipment installation proposals that may be in the pipeline in beginning 2006. Most importantly this will state explicitly that current Energy Star equipment may not be represented as such after a set date.

ACCA appreciates the opportunity to provide comments to EPA on these three issues. If you have any questions or need further information, please feel free to contact Glenn Hourahan, Vice President of Research and Technology at ACCA.

Sincerely,



Paul Stalknecht  
President and CEO