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November 4, 2004

Rachel Schmeltz
Energy Star Product Manager
United States E.P.A.

Dear Ms. Schmeltz:

The City of Lodi (CA) Electric Utility embarked upon an exciting new effort in September of 2003. The *Lodi House-As-A-System Inspection Program*, funded through the City of Lodi Public Benefits/Goods Program, has tested in excess of five hundred (500) residential dwellings in the past 13 months. The results of our testing have been staggering.

The *Lodi House-As-A-System Inspection Program* provides residential customers with a free, on-site computer diagnostics test of the home's air delivery system. Specifically, the testing protocol (utilizing the Honeywell-Analyses technology) measures mechanical system air flow and air return. Of the five hundred plus homes that we have tested over the past year, approximately 80 percent have failed this extensive testing procedure. What do the results tell us? The results show that a significant majority of the single-family dwellings (homes that are at least ten years of age or older) in our community, have mechanical equipment systems that have been designed/installed incorrectly. Simply stated- these homes that have failed the test have poorly designed air supply and/or air return systems, and thus in most cases, this leads to a mechanical system that is sized *incorrectly* (too many tons, or too few tons).

Lodi provides this test free of charge to residential customers, and offers rebates ranging from \$300 to \$600 for the repair and/or replacement of the home's air delivery system. ***As the program manager for the electric utility department, I opted to discontinue any/all rebates for high efficiency central air conditioning units based upon the findings of the inspection testing program.*** I do not believe that rebates or incentives should be provided to customers for mechanical unit (central HVAC unit) retrofits, if the air delivery system is not addressed first.

By way of this correspondence, I am introducing our program to you, and I am urging your office to consider adopting a similar program standard nationwide. As we inform our residential customers: you would not buy a brand new, fuel efficient automobile, but then fail to inflate the tires properly (poorly inflated tires, as you are most likely aware, lead to dramatically diminished fuel efficiency, while also creating a safety hazard and leading to premature tire wear/failure); hence, why would you purchase and install a high efficiency (12.0 + S.E.E.R) central air conditioner in your home, **without** first (or at least simultaneously) addressing the air delivery system?

November 19, 2004

I would be happy to discuss our program efforts with you and your team in greater detail. On behalf of the City of Lodi Electric Utility, thank you for your time and consideration regarding this matter.

Cordially,

Rob Lechner
Manager of Customer Service & Programs
City of Lodi (CA) Electric Utility
(209) 333-6800, extension 2583