

Dear Ms. Schmeltz:

I was reviewing your letter this evening regarding the inclusion of installation-specific criteria for Energy Star ratings. I will be attending the conference in Chicago, but while it was fresh in my mind, I wanted to send you some comments. One of the biggest problems from my experience with split system air conditioners and heat pumps, especially higher efficiency models, is coil match up. For example, if you look at evaporator coil match ups for an 18 SEER condenser, there may only be one match that actually meets the 18 SEER rating (typically a 3 ton condenser with a 5 ton evaporator). There is nothing wrong with this approach as long as the customer actually gets this match. Otherwise, the sale of the 18 SEER air conditioner could quickly become a 14 SEER, while the consumer would think that he/she was getting an 18 SEER unit. This is especially important if the Energy Star label will be applied because the coil match up could actually cause the performance to be below Energy Star requirements, defeating the purpose of the rating.

As a manufacturer of residential geothermal heat pumps, we have looked at this issue in some detail in putting together our GeoDesigner energy analysis software. Even though most of our installations are packaged units, the comparison system is usually a split system, so modeling both systems correctly is needed in order to look at system economics. I would propose that the solution to the coil match up issue be solved by requiring that both the condenser and evaporator part numbers be included on the Energy Star label. For example, "Energy Star rating only valid when model XYZ condenser is matched with model ABC fan coil or model 123 cased coil and furnace with ECM motor.

Hopefully, my comments are helpful. If you have any questions or if I can be of any assistance, please don't hesitate to contact me.

Regards,
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