

November 3, 2004

Rachel Schmeltz
Energy Star Product Manager

Dear Rachel:

Thank you for the opportunity to provide comments on the DRAFT document *Options for a New ENERGY STAR® Specification for Residential Air-Source Heat Pumps and Central Air Conditioners*.

Enalasy is an information and verification services provider enabling HVAC contractors, HVAC Equipment Manufacturers, Insurance Companies, Electric Utilities, Builders, and local and State Governments with leading, state of the art, accurate instrumentation and remote data collecting technologies and procedures. We provide comprehensive training and certification of HVAC technicians who use our equipment to do a comprehensive “test-in” to analyze the performance of HVAC equipment and the distribution system. This is accomplished by the technician deploying a number of wireless sensors to measure all of the necessary indices required to measure the performance of the HVAC system. A laptop computer receives, processes, and stores the data. It provides graphs showing the real-time performance of the system, as well as providing recommended corrections/adjustments to optimize the performance of the HVAC system. This provides a rapid (on the site) feedback learning process to the technicians as they perform the necessary remediation to correct discovered deficiencies in the HVAC system. Once the deficiencies have been corrected, the technicians do a “test-out” to verify optimized performance of the HVAC system, as well as quantifying the improvement of the system. Upon returning to their office, the technicians upload this data from each job to a central database which provides this information to the “sponsoring entity” which could be a utility, builder, or local, state or federal agency.

We currently have over 300 Honeywell Enalasy Alliance members (HVAC contracting firms) nationwide and have either been involved or are involved in over 25 utility and state projects including currently Pacific Gas & Electric’s CPUC funded charge and airflow program.

Here are our comments:

The over all direction of the 2006 Energy Star VSP initiative is excellent, and is in line with the market approach Enalasy has invested over six years developing and implementing, as well as investing 16 million dollars.

Chapter III Options for Field Verification of Proper Installations

3) Third-Party Verification Services

Please consider adding under this section another option allowing certified contractors who are trained to use Energy Star Approved and Registered diagnostic methodologies and data collection processes to do test in and test outs that use an electronically collected and analyzed process. This offers a system that effectively minimizes or eliminates the probability of "gaming" the system.

Another significant and major advantage in using this type of electronic data acquisition is that it completely removes the large expenditure and logistical coordination of an independent 3rd party of checking systems. This is one of the largest barriers being experienced in the field verification processes today. This will help the rapid adoption nationally of the use of diagnostic testing systems in the HVAC industry. Our system and processes economically allows 100% system verifications which adds value to the HVAC contractors business with rapid data collection processes and immediate feedback. This is a continuous feed back loop which will improve the skill and knowledge level of the technician. It will help provide a sustainable technology transformation in the HVAC repair and installation industry.

The above option can be augmented for additional auditing processes by requiring a random selection of 30 tested systems by the verification service provider and adding a red-flag decertification of the HVAC firm when the verification service provider detects fraudulent results. Training certification would be provided by the Verification Service Provider or approved agent of the Verification Service Provider.

By including this option, it truly gives HVAC contractors, HVAC manufactures, builders, and utilities a choice to choose a Verification Service Provider that will not infringe upon their core business, and allows innovators and HVAC business owners to offer a value added service to the customer.

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