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August 23, 2005

Ms. Rachel Schmeltz
Energy Star Program Manager
U.S. Environmental Protection Agency
Washington, D.C.

Sent by email

Draft Energy Star Criteria for Residential Air-Source Heat Pumps and Air Conditioners

Dear Rachel,

I am responding with comments to your revised proposals of August 2, 2005.

NRCan supports the higher levels of EER 12 and HSPF 8.5 as previously proposed.

In Canada, with our relatively short but hot cooling season, and long heating season, great benefits for Energy Star equipment would be gained with higher EER air conditioners and higher HSPF heat pumps. Electrical utilities are awakening to the need to lower peak demands in summer, and reduced electricity use in winter. Accepting a lower requirement for EER will mean less interest from electrical utilities in Energy Star. It would likely to reduce utility support for proposed installation criteria in 2007 and beyond.

It appears from your letter that the lack of verified EER data is the major barrier in accepting a higher level. However, based on analysis done for NRCan, we are not confident that EER 11.5 represents high performance equipment.

Early acceptance of the proposal for 2009 could mean a significant delay in setting the appropriate high performance EER level.

We understand that ARI began their verification program for EER starting in November of 2004. Energy Star qualified SEER 14 equipment will make up only a small portion of the equipment models. If treated as a priority, the time requirement to verify EER ratings for equipment with SEER 14 could be relatively short.

Therefore, our primary request is to work quickly towards development of the appropriate (probably higher) EER criteria. If a target date of early 2007 were set, it would coincide with the proposed schedule for developing the installation criteria for Energy Star air conditioners. High performance EER and proper installation would be an attractive package for utilities.

The question about third party coils is of great concern. If the method for rating third party coils overestimates EER, it will affect the SEER ratings also. For Energy Star, third party coil models should be removed unless they are rated in the normal way. Since Energy Star requires matched equipment, it would seem that third party coils would not be included unless they have been rated in the same way as normal matched equipment.

The uncertainty about ratings for many models that have been used in your analyses would support the notion that the high performance EER level should not be set immediately.

As you know, NRCAN had proposed that EER reporting be mandatory in an amendment to our Energy Efficiency Regulations. NRCAN is still considering this as an option. Doing so might facilitate progress on this issue since our EE Regulations would require verified data.

Regards,

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