

SMUD

SACRAMENTO MUNICIPAL UTILITY DISTRICT
The Power To Do More.SM

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August 23, 2005

Rachel Schmeltz
ENERGY STAR Program Manager
Office of Air and Radiation
U.S. Environmental Protection Agency

Dear Rachel:

The Sacramento Municipal Utility District (SMUD) appreciates the opportunity to comment on the Revised Final Draft specification for ENERGY STAR-qualified air-source heat pumps and central air conditioners. The proposed changes are spelled out in your letter of August 2, 2005. We understood that the previous changes made that became the Final Draft, and which SMUD supported, were reached through consensus; we are therefore greatly disappointed to see that some of these have been reversed.

SMUD offers the following comments regarding these two proposed changes.

CHANGE: Energy-efficiency criteria for split systems have been adjusted to 14 SEER/11.5 EER/8.2 HSPF.

COMMENT: As we did with EPA's previous reduction of proposed efficiency tiers—to 11.5 EER from 12 EER and to 8.2 HSPF from 8.5 HSPF (Draft 2, May 27, 2005)—SMUD strongly objects to this reduction. Our objection is based on the same reasons spelled out in our comments to you dated June 24. Those reasons were that, first, we believe that ENERGY STAR would be sacrificing important peak-load efficiency of air conditioners. Second, our program has been successfully using the higher efficiencies (14/12/8.5) for nearly four years. There is now, and we believe that manufacturers will continue to provide, sufficient product to meet our program requirements and consumer and contractor demand for that product. While SMUD will continue to promote the ENERGY STAR label in general, our 2006 air conditioner/heat pump efficiency rebate program will begin with 14/12/8.5 for split systems, and not dilute progress by using lower-efficiency criteria.

CHANGE: A second tier, effective January 1, 2009, for split systems has been added with energy-efficiency criteria at 14.5 SEER/12 EER/8.2 HSPF.

COMMENT: SMUD is opposed to this change as well, for two reasons. First, as we've stated, an EER of 12 should be implemented now; to delay until 2009 would be both unnecessary and wasted opportunity for peak-load efficiency widely available in today's products. A half-point increase in SEER and EER and no increase in HSPF is not much progress in this time frame. SMUD's program currently uses 15/13/8.5 as our top tier, and while product is of course less

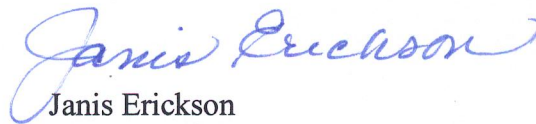
available than 14/12/8.5, it is still available for many home-improvement projects. Again, the proposed 2009 efficiencies would be a step backward.

Second, as the energy-efficiency and related product industries have seen over the past 20-30 years, efficiency technology continues to improve. To set a standard this far in advance would unnecessarily constrain continued product-efficiency improvement and efficient-product production—when product even more efficient than that proposed (15/13/8.5) is available and selling in today's market. SMUD and other utilities will have been successfully promoting higher-efficiency product well before the 2009 implementation of 14.5/12/8.2.

Again, thank you for this opportunity to offer our comments.



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