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August 23, 2005

Ms. Rachel Schmeltz  
U.S. Environmental Protection Agency  
Office of Air and Radiation  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

Re: Energy Star Proposals for Central Air Conditioners and Heat Pumps –  
Revised Final Draft

These are the comments of Southern Company on the “Revised Final Draft” proposed 2006 Energy Star Standards for central air conditioners and heat pumps.

Southern Company (Southern) is the parent firm of five electric utilities in the southeastern United States: Alabama Power, Georgia Power, Gulf Power, Mississippi Power, and Savannah Electric. These electric utilities serve over 3.7 million customers, including 3.2 million residential and 479,000 commercial customers. Our 120,000 square mile service territory includes most of Georgia and Alabama, southeastern Mississippi, and the panhandle region of Florida.

Southern Company is an active participant in the Energy Star™ program, and appreciates the opportunity to comment on the proposals.

The proposed modifications to the energy efficiency criteria are reasonable adjustments to the 2006 standards. These should insure that an adequate variety of products are available in 2006 which meet Energy Star™ standards. The slightly higher standards proposed for 2009 are also reasonable, and we agree with your proposal to keep the required HSPF at 8.2 in 2009, while raising the minimum SEER to 14.5 from 14.0, and the minimum EER to 12 from 11.5.

Thank you for the opportunity to comment on these Energy Star™ proposals.

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