

April 8, 2005

Rachel Schmeltz  
ENERGY STAR Product Manager  
Environmental Protection Agency  
Ariel Rios Building, SW, MS 6202J  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Dear Ms. Schmeltz:

The Air Conditioning Contractors of America (ACCA), the Air-Conditioning and Refrigeration Institute (ARI), and the undersigned members of the Consortium for Energy Efficiency (CEE) strongly urge EPA to create a two-part label for the CAC/ASHP specification that allows HVAC manufacturers to continue labeling equipment in the factory and using the ENERGY STAR brand in their marketing materials.

The current EPA proposal risks a reduction in the resource base to promote the brand, and the loss of a critical ally in efforts to promote energy-saving HVAC systems. The undersigned believe a two-part labeling scheme that conveys the importance to consumers of both high-efficiency equipment and a quality installation is both desirable and achievable. As envisioned, the label affixed to equipment in the factory (and used in manufacturer marketing materials) would convey that the equipment meets the performance requirements of the ENERGY STAR specification. Possible language for this label includes: "ENERGY STAR Qualified," "ENERGY STAR Manufactured," "ENERGY STAR Eligible," "ENERGY STAR Capable," or "ENERGY STAR Ready." We believe EPA should allow manufacturers to continue using the ENERGY STAR logo in their marketing materials when specific language stating the importance of a quality installation accompanies that logo. For consumers to benefit, this language must be consistent with the requirements of the ENERGY STAR specification but remain simple, clear, and concise.

A second label with language such as "ENERGY STAR Installed" would be affixed (or presented to consumers in the form of a certificate) only when the installation is verified to have met all the requirements of the ENERGY STAR specification.

This approach will encourage manufacturers to continue their strong involvement in the ENERGY STAR program while providing a platform to educate consumers on the necessity to have the equipment installed according to EPA's quality installation requirements.

Respectfully,

Air Conditioning Contractors  
of America

Air-Conditioning and  
Refrigeration Institute

Consortium for Energy  
Efficiency HVAC Committee



**CEE Residential HVAC Committee “Supporting Organizations”**

Alliance to Save Energy  
Cape Light Compact  
Connecticut Light and Power  
Efficiency Vermont  
Midwest Energy Efficiency Alliance  
National Grid USA (Mass Electric, Nantucket Electric, Narragansett Electric)  
New York State Energy Research and Development Authority  
Northeast Energy Efficiency Partnership  
NSTAR  
Office of Clean Energy of the New Jersey Board of Public Utilities  
Oregon Energy Trust  
Pacific Gas & Electric  
PacifiCorp  
Sacramento Municipal Utility District  
San Diego Gas and Electric  
Southern California Gas Company  
Tacoma Power Energy Services  
TXU Electric Delivery  
Unitil  
Western Massachusetts Electric Company