

Dear Ms. Rachel Schmeltz,

As requested here are my comments regarding the proposed Energy Star Program Requirements for Residential Air Source Heat Pump and Central Air Conditioner – Draft 1. While I appreciate EPA's desire to have delivered efficiency, I am not convinced that third party verification of every system is the right approach. Contractors that already do things right (like using nitrogen to braze the refrigerant lines, pull the necessary vacuum on the refrigerant system, and properly size the equipment using ACCA Manual J and S) already are at a "cost of installation" disadvantage and adding the additional cost and hassle of third party inspection would only penalize us further. Likewise not allowing manufacturer's to label their equipment as Energy Star also needs looking at.

As a contractor a couple of the areas I see that detracts from the installed system delivering stated efficiencies are:

Inconsistency in the published manufacturer installation instructions (there should be a minimum standard adopted by the manufacturers as to what are the minimum requirements for installation; i.e. use of nitrogen, amount of vacuum, etc...) so that the industry has one criteria to learn and not vary manufacturer by manufacturer.

Manufacturer installation instructions not being followed by the installer (i.e. no nitrogen and vacuum then purging of the lineset/coil with refrigerant and then charging unit).

Code officials not enforcing the requirements of the installation instructions.

No immediate financial reward for doing the job right or no likely immediate penalty for taking short cuts.

Then when the above does happen and something fails prematurely, most manufacturers honor the voided warranty for the sake of good PR; encouraging the "short-cut" behavior to continue. Not to mention the fact that the repaired system is likely to fail again prematurely.

Contractors that install Energy Star systems (systems that are installed properly and deliver stated efficiencies) should not be penalized with the added cost and hassle of third party inspections on top of code inspections. There needs to be a better way. Most manufacturers have "preferred" or "authorized" dealer programs already that typically consists of the better contractors, why can't something be worked out with Energy Star labeling systems through a minimum criteria possibly consisting of some of the following: participation in manufacturer's "preferred" dealer program, contractor certification, NATE certified installers, and or code inspection. This would be better than trying to establish a new third party level in the industry that does not directly get to some of the core issues with ending up with installed systems delivering their stated efficiencies.

Thank you for your consideration of these comments.

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