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**Carrier**

A United Technologies Company

John Mandyck  
Vice President  
Government and International Affairs

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Ms. Rachel Schmeltz  
ENERGY STAR Program Manager  
Office of Air and Radiation  
U.S. Environmental Protection Agency  
Washington, D.C. 20460

Dear Rachel:

Thank you for providing Carrier the opportunity to comment on the most recent draft specification for Energy Star qualifications for air source heat pumps and central air conditioners. Carrier Corporation has a long history of providing environmentally sustainable technologies to the market place. Carrier has made a commitment to provide consumers across North America with a full range of environmentally sustainable products that not only utilize non-ozone depleting refrigerants such as Puron, but also allow a broad range of energy efficiency options that leverage energy conservation incentive programs.

### **Split Systems**

**Energy Efficiency Levels:** Carrier strongly believes that a split system performance guideline of 14 SEER coupled with 11.5 EER presents the homeowner with the broadest system options for both the purchase of equipment in a new construction environment, as well as the replacement of existing equipment in an add-on or replacement environment. Should EPA pursue a 12 EER rating, it will be limiting homeowners to less than 1/10<sup>th</sup> of the split system combinations that can meet the Energy Star performance criteria. By shifting the EER rating to 11.5 EER, Energy Star will provide greater consumer choice and increased national penetration for Energy Star products. This more complete range of options will allow EPA to achieve stronger energy conservation results.

**Installation:** Carrier continues to support the proper sizing and installation of split systems and encourages EPA to explore system technology in the form of diagnostics that will provide confidence to the homeowner that their systems have been appropriately charged. Diagnostics can also streamline the verification process.

**Product Marketing:** Carrier is concerned that the current draft specifications eliminate the role of manufacturers from the Energy Star partner process.

While we support the concept of quality installations, we recommend a two-step labeling process for Energy Star that maintains a partner role for manufacturers as follows:

1. Manufacturers should be allowed to market complying products as "Energy Star Qualified."
2. Installing contractors should label verified installed systems as "Energy Star Compliant."

### **Packaged Products**

**Scope:** For consistency and clarity in the marketplace, we urge EPA to clarify that the Energy Star specifications should cover both single and 3-phase residential and commercial products less than 65,000 Btu/h.

**Installation:** For the quality installation process, we urge Energy Star to consider the following:

- As noted above, we recommend a two-step labeling process for Energy Star that maintains a partner role for manufacturers.
- We caution EPA not to require complex procedures for verification, which could lead to greater consumer expense and reduced sales of Energy Star products.
- For airflow considerations, we remind EPA that actual airflow is dependent on ductwork design. As such, efforts should be made to insure proper duct design.
- For charge levels, we also remind EPA that packaged units are, at least for Carrier, charged at the factory using calibrated and accurate charging systems. Verification of charge in a field setting will not be as accurate.

**Prescriptive Requirements:** Carrier supports the latest draft specifications that remove prescriptive design requirements for Energy Star. Design flexibility is crucial to manufacturing innovation.

We appreciate both the opportunity to be a part of the Energy Star development process as well as the opportunity to comment on substantive elements of the program. Please do not hesitate to contact me if you have any questions or require further information.

Sincerely,



John M. Mandyck  
Vice President  
Government & International Relations