

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



OFFICE OF
AIR AND RADIATION

January 28, 2005

Dear Air Source Heat Pump/Central Air Conditioner Manufacturers and Other Interested Parties:

EPA is pleased to provide you with the following **Draft** specification for ENERGY STAR[®] qualified air source heat pumps (ASHPs) and central air conditioners (CACs) and welcomes your comments. The document outlines the criteria that ASHPs and CAC will need to meet to qualify for ENERGY STAR beginning January 26, 2006 (as currently drafted). All interested parties are encouraged to review the draft specification and provide **comments by March 25, 2005**.

EPA distributed an "Options Document" at the end of September and held the 2004 ENERGY STAR HVAC Partner and Stakeholder Meeting on October 6th in Chicago. During that meeting and in the weeks following, EPA received many thoughtful and constructive comments on both the "Options Document" and various ways ENERGY STAR could address not only equipment efficiency, but also improving the quality of ASHP/CAC installations. All comments received on the Options Document were reviewed and considered carefully during the development of the Draft specification. These comments may be found at www.energystar.gov/index.cfm?c=revisions.ac_ashp_spec.

The proposed Draft specification contains two sections: 1) Partner Commitments which outlines which entities may be ENERGY STAR Partners under this specification and what would be asked of them under the partnership; and 2) Eligibility Criteria which contains the definitions, qualifying products, energy efficiency specifications, testing requirements, and effective date information.

The proposed Draft specification represents a major shift in EPA's approach to the ASHP/CAC market. In addition to energy efficiency criteria for equipment, EPA is proposing requirements that address some of the issues effecting ASHP/CAC installations: improper sizing, under- and over-charging of refrigerant, and inadequate airflow. The proposed installation criteria include proper sizing of equipment, matched assembly of split systems, and independent verification that air flow and refrigerant charge meet manufacturer's specifications. EPA believes this approach will deliver greater environmental benefit while helping consumers save more money for their upfront investment.

These changes will effect the way the ENERGY STAR label can be used to promote high efficiency ASHP/CAC equipment. Specifically, manufacturers would no longer be allowed to label equipment as it leaves the factory. Labeling would instead occur once installation is completed and the air flow and refrigerant charge have been independently verified.

EPA has designed this draft specification to allow manufacturers expanded opportunities to participate in regional energy efficiency efforts. In addition, it is hoped that the emphasis on quality installation will benefit manufacturers by potentially reducing the number of unfounded warranty claims on equipment when installation is really the problem. From a contractor perspective, ENERGY STAR can continue to be a tool

to up-sell to higher SEER equipment as long as it is installed according to the parameters outlined in the specification.

Although efficiency program sponsors are the likely first implementers of verification programs under this specification, this specification was designed to allow for flexibility in who can be a Partner and how they implement their program. EPA will consider a variety of verification protocols for approval. Protocols may include, but are not limited to: on-site inspection by an independent third party, remote verification, verification sampling, and contractor accreditation that includes verification. Manufacturers of ASHP and CAC equipment can remain ENERGY STAR Partners should they choose to institute an installation verification program for contractors.

Please send all comments by **March 25, 2005** to me at schmeltz.rachel@epa.gov. Should you have any questions about the Draft specification please contact me via e-mail or phone at (202) 343-9124.

Regards,

A handwritten signature in black ink that reads "Rachel Schmeltz". The signature is written in a cursive style with a long, sweeping tail on the "z".

Rachel Schmeltz
ENERGY STAR Program Manager