

October 26, 2004

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

Dear Ms. Schmeltz:

The Edison Electric Institute (EEI) is pleased to provide comments on the proposed new Energy Star levels for central air conditioners and heat pumps.

EEI is the association of the United States investor-owned electric utilities, combination gas & electric utilities, industry affiliates, and associates worldwide. Its U.S. members serve 90 percent of all customers served by the investor-owned segment of the industry. They generate approximately 73 percent of all the electricity generated by electric utilities in the country and service 70 percent of all ultimate customers in the nation.

### **General Comments**

- 1) EEI is in favor of voluntary, market-based programs like Energy Star. It has provided many “win-win-win” aspects to consumers, manufacturers, and utilities that promote high efficiency equipment to customers.
- 2) EEI would suggest that EPA make a final decision on the Energy Star efficiency levels by September 2005, to go into effect on January, 2006, when new minimum standards for residential air conditioners and heat pumps take effect.
- 3) Many EEI members still provide incentives for customers to purchase high efficiency air conditioners and heat pumps. Many of the member companies may use Energy Star levels to set a “floor” on the efficiency levels needed to receive an incentive. It would be of great help if EPA were to finalize the SEER, HSPF, and EER levels by September 2005.
- 4) In terms of the efficiency levels, EEI suggests that EPA work with ARI on mutually acceptable levels. The levels should increase efficiency, but they should not limit customer choice or competition. The levels, whether on the cooling side,

heating side, or the combination, should not be too high that some manufacturers will not be able to offer Energy Star models.

- 5) From a utility peak demand point of view, EEI is in favor of setting an EER level as part of the Energy Star specification. In terms of utility programs and rebates, EEI would like to see publications or spreadsheets that detail which models meet the Energy Star levels, and information on different models and their SEER, EER, and HSPF levels. EEI would be glad to work with EPA and ARI to make sure that this information is distributed to EEI member companies and end-use customers.

### **Specific Comments on the Strawman Documents**

In terms of the requirements for built-in sensors, on-board diagnostics, use of certified technicians, duct leakage, refrigerant charge, and air flow: EEI understands the rationale for improved installation of this equipment, but as far as EEI is aware, this would be the first time that EPA ever made any such requirements. This may set a precedent for other appliances, since improper installation can affect the performance of many appliances.

Also, this may complicate the use of an Energy Star label on heat pumps and air conditioners. If some of the installation requirements are not met, who would have the authority to remove the Energy Star label? Or will installation technicians be the only people allowed to put an Energy Star label on air conditioners and heat pumps? Will there need to be 3<sup>rd</sup> party verification, and if so, who will pay for it, and will installation technicians take the risk of a customer seeing an Energy Star label removed?

In addition, if these requirements raise the price of Energy Star units, there is a possibility that fewer consumers will purchase them due to higher prices due to the program. This would lead to fewer high-efficiency units being installed – which is direct conflict with program goals.

Thank you for your review of our comments.

Sincerely,

Steven Rosenstock, P.E.  
Edison Electric Institute  
cc: Rick Tempchin, EEI  
Michael McGrath, EEI