

Ms. Schmeltz,

This e-mail is in response to the package of materials that is dated August 2, 2005.

EEI agrees with the SEER and EER value revisions, and would like to see them finalized before the end of 2005 to allow utilities time to adjust their incentive and education programs for 2006.

For combination electric AC / gas furnace package units, EEI would like to see Energy Star efficiency standards for the gas equipment portion. It does not make sense for gas equipment that only meets federal minimum efficiency standards to receive an Energy Star label.

For the combination units, here are suggested options:

- 1) For units that meet the new Energy Star specifications for electric cooling and existing Energy Star specifications for gas heating systems, the traditional Energy Star Label can be used.
- 2) For units that meet the new Energy Star specifications for the electric cooling system, but do not meet the existing Energy Star specifications for gas heating systems, the Energy Star label should be modified to say "for cooling only", with information that makes it clear to consumers that the gas heating system is minimum efficiency, does not meet Energy Star specifications, and will cost more to operate. If only the gas side meets Energy Star, then the label should be modified to say "for heating only."
- 3) Units that do not meet the Energy Star specifications for either of the cooling or heating systems (both are less than Energy Star specs) do not receive the Energy Star label.

Thank you for your review of our comments.

Steve Rosenstock  
Manager, Energy Solutions  
Edison Electric Institute