



March 29, 2005

Rachel Schmeltz  
Energy Star Program Manager  
U.S. EPA  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Re: Energy Star Program Requirements for ASHPs & CACs Eligibility  
Criteria 28/01/2005 Draft

Dear Ms. Schmeltz:

SMACNA appreciates the opportunity to provide comment on the aforementioned draft document produced by the U.S. EPA.

SMACNA supports the goals of EPA in recognizing that the HVAC System Installation is perhaps the more critical component to assuring that energy savings are actually realized. The residential end-user would obtain more benefits with a properly installed lower SEER unit than an improperly installed high SEER unit. These benefits would be in the areas of comfort and payback (energy savings).

Energy Star Labeling is critical to the continued success of the program. Manufacturers need to be major participants in the program, to promote and sell Energy Star capable equipment. As currently written, the proposal completely removes the Original Equipment Manufacturer (OEM) from Energy Star. We feel it is self defeating to eliminate the strong support of the OEM community. How can they market their high efficiency products under Energy Star when it is really dependent on the competence of the installing contractor? This point becomes even more important if the HVAC air distribution system is included in the requirement. Potentially a two label system could address this issue to retain the support of the OEM community. The first label stating that the equipment is capable of Energy Star performance and the second label placed after installation, giving the system the Energy Star status.

SMACNA also supports EPA's position on quality installations. It is obvious to achieve equipment design efficiency it is indeed important that the components be installed per manufacturers' instructions/guidelines. This includes ensuring that the correctly sized (and properly matched) components are installed with the appropriate refrigerant charge and the right airflow across the coil. We would also recommend the quality of the installed HVAC air distribution system (ductwork) as it relates to design and leakage be addressed.

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This second label could be problematic and costly, should a third party be required. SMACNA recommends that a Technician Certificate be developed, complete with a code of ethics. This would assure that the installation was up to Energy Star standards without the cost of third party verification.

Again, we applaud your efforts and feel that raising the bar in a constructive way will continue to allow Energy Star to lead the efforts in the residential market.

Professionally yours,  
SMACNA

A handwritten signature in black ink that reads "Eli P. Howard, III". The signature is written in a cursive style with a horizontal line at the end.

Eli P. Howard, III  
Group Director Technical Resources