



Heating ■ Air Conditioning

Unitary Products Group
PO Box 19014
Wichita KS 67204-9014
Telephone (316) 832-6400

June 24, 2005

Ms. Rachel Schmeltz
ENERGY STAR Program Manager
US Environmental Protection Agency
Ariel Rios Building, SW, MS6202J
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Ms. Schmeltz:

York International appreciates the opportunity to provide the comments shown below on the Draft 2 revisions to the ENERGY STAR Central Air Conditioner and Air Source Heat Pumps specifications.

Equipment Criteria

With regard to the equipment specifications, we support the energy efficiency criteria as shown in the Draft 2 document.

Partner Commitments

The additional disclaimer text as shown on the Draft 2 Partner Commitments is acceptable. One question for clarification is whether the proposed disclaimer text needs to appear on the Energy Guide Label if the ENERGY STAR label is shown on that Energy Guide Label? The text indicates that the disclaimer text is to be added, “whenever the ENERGY STAR certification mark is used”. So that leads to the question above.

Installation Criteria and Field Verification

As equipment manufacturers, we continue to oppose tying equipment specifications and installation requirements together, and are gratified to see that the equipment specification is to be left as a stand-alone requirement for meeting ENERGY STAR criteria. We applaud the decision to develop a separate specification for the proper installation requirements, with appropriate input from a working group of all interested parties.

Phase-in of New Specification

The proposed date listing equipment with a date of manufacture after March 27, 2006 is acceptable to York for finalization of the new specifications.

Package Product Exclusion

We do not support the exclusion of gas/electric package products from the ENERGY STAR specifications on the basis of the lack of a heating requirement. The real savings potential on cooling applications that the ENERGY STAR specification provides has far greater significance than the small potential savings that could be achieved with the addition of a heating specification requirement at this time. Current heating efficiency levels for package products do not provide for the opportunities of similar levels of improvement that are available for residential heating products.

Summary

Given the new 13 SEER federal minimum, we feel that the Draft 2 specifications for the ENERGY STAR program are acceptable moving forward. The importance of continuing a stand-alone equipment specification must be stressed. We oppose excluding package products from the specifications at this time as that action defeats awareness of potential energy savings in a significant product segment.

Thank you for the opportunity to submit these comments. If you have any questions regarding this submission, please feel free to contact the undersigned.

Sincerely,

Bryan K. Rocky

Bryan K. Rocky
Product Manager – Heating Products
North America
York International, Unitary Products Group
Email: bryan.rocky@york.com
Telephone: 316-832-6431
Fax: 316-832-6598

Cc: Cos Caronna, York UPG
Steve Maddox, York UPG
Jeff Tucker, York UPG