

Good Morning, Ms. Schmeltz....

My name is Walt Pierce and I am the owner of Commonwealth Heating and Contractors, Inc., a Richmond, VA based residential hvac contractor.

Our firm has been serving the needs of local homeowners for over 50 years. During that time our specialty has remained in the "retrofit" market, going into existing homes and replacing/updating existing heating and/or cooling systems. My background with this firm goes back into the mid-1960s, when I was a helper in the installation area. My full time tenure working with customers on equipment selection and layout began in the late 1970's and has continued uninterrupted ever since.

I have read several of the documents online pertaining to the proposed revisions to the Energy Star labeling program. I disagree with your basic thesis and therefore, have an entirely different perspective as to the possible outcomes of the revisions.

The basic thesis as postulated as it pertains to the retrofit market is that existing duct systems are inherently sized incorrectly and that purchasers of high end Energy Star equipment would accede to having their duct systems replaced to achieve additional energy savings. I disagree on several key points.

First, while the typical customer in this market is interested in energy efficiency, they usually will defer taking any action until they perceive a need for our equipment/services (i.e. equipment failure-in a time of need). When that need is perceived the customers desire and expect IMMEDIATE restoration of their heating/cooling. A customer sweating it out in a hot house on a 90 plus degree day is NOT interested in waiting additional time to have his ductwork replaced, regardless of how much energy savings might be achieved. That customer wants service NOW and usually the contractor who can serve those needs in a reasonably timely manner will get the job.

Secondly, any additional savings (over and beyond what the 14 SEER equipment would provide) by replacing ductwork would be nominal and achievable by the consumer only after several years. Surveys have shown that homeowners frequently move, usually within the 4-7 year time frame.

Thus, benefits would likely only accrue to long term homeowners and not the majority of short term homeowners.

Thirdly, by establishing such stringent labeling standards it is unavoidable that costs will increase in quite a few respects. Some of those cost increases would be in the additional overhead implementing proposed inspections as well as any remedial ductwork proposed.

Implementing the labeling program, because of the cost increases described, would then have the unintended effect of causing some budget wary consumers to trade down away from higher SEER equipment.

Fourthly, consumers have been taught when making major purchases to get three estimates whenever possible. When that consumer calls their preferred hvac contractor on that hot 90 degree day with health issues and wanting to know how much and when a/c can be restored they are not interested in some protracted process that may involve unknown dollars and make comparative shopping an impossibility. They want to know specifics on that day so that they can make a purchasing decision right then and there. Including an unknown factor into the equation again would have the unintended effect of driving consumers into lesser efficient equipment.

Finally, as a small business owner I have had previous experience with similar programs, sponsored by our utility company, and I came away with negative feelings about the entire process. Having a job inspected by a third party (other than local building officials) creates a credibility issue that can become difficult, if not impossible for the original installing contractor to overcome.

I am a proponent of high efficiency equipment. In fact, during 2004 my firm was recognized by Carrier Corporation as being the sales leader in central Virginia on Infinity (Carrier branded high efficiency equipment) systems. However, in the market that I serve I do not see your program as truly workable or having the desired outcomes nationally.

I would offer two suggestions. First, that some exclusion or relief be granted to the retrofit market such that those homeowners would still be encouraged to purchase high end equipment. Perhaps the program can be tiered...letting the consumer have that choice. Second, the labeling program should be aimed at installers of equipment in new construction. It is absolutely amazing how many high end homes come equipped with basic builder grade hvac systems.

Thank you for taking the time to read my comments.

Sincerely,

Walter B. "Walt" Pierce
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