



June 21, 2005

Rachel Schmeltz  
ENERGY STAR Product Manager  
Environmental Protection Agency  
Ariel Rios Building, SW, MS 6202J  
1200 Pennsylvania Avenue, NW  
Washington DC 20460

Dear Rachel,

Lennox commends the EPA ENERGY STAR<sup>®</sup> program staff for their willingness to work with the industry in this transition for the ENERGY STAR program on Central Air Conditioners and Heat Pumps precipitated by the change in the Federal minimum efficiency standard.

With respect to the second draft dated May 27, 2005 currently out for comment, we would offer the following comments:

We fully support the proposed change in EER and HSPF requirements for split systems, and believe it will result in a successful balance of complying equipment selection and increased energy savings. The selection of equipment available is key to keeping the window of opportunity open for continued dealer and consumer participation.

On the question EPA has posed on the value of continuing to include packaged equipment with gas heating, we believe that as currently administered the program has value to all involved.

- The majority of packaged units for residential usage are in moderate heating climates, and the majority of available energy savings are recognized due to the cooling performance. Even if a high efficiency heating section (90 AFUE) were available, it would not have a payback in most installations.
- If packaged units are removed, a substantial energy savings opportunity is lost in those markets with high concentrations of packaged equipment. The systems will not be converted to split system equipment due to ductwork and space constraints, leaving no viable ENERGY STAR option.
- Removing Gas packs from the program could result in fuel switching, and perhaps straight electric heat units rather than heat pumps for those desiring packaged ENERGY STAR products.

With regard to the equipment manufacturing changeover date, we again thank the EPA staff for hearing and responding to the needs of the industry and marketplace. We would ask, however, that the date be changed to April 1, 2006 for a logistical reason. Most manufacturers, including Lennox Worldwide Heating and Cooling mark only the month and year of manufacture on the equipment, therefore making it impossible to segregate pre- and post-March 27 units. With the breakpoint a few days later, there will be much less confusion and consternation with regards to programs and reporting by allowing an April 1 effective date.

We're pleased with the intent to have a label available for the equipment and product literature, and look forward to working out the details of it with EPA and the industry.

If you have any comments or questions, please do not hesitate to contact us.



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