

RHEEM
MANUFACTURING
COMPANY

AIR
CONDITIONING
DIVISION



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VIA EMAIL TO: schmeltz.rachel@epa.gov

April 8, 2005

Ms. Rachel Schmeltz
ENERGY STAR Product Manager
U.S. Environmental Protection Agency
Office of Air and Radiation
1310 L Street, NW
Washington, DC 20005

RE: Options for a new ENERGY STAR® Specification for Residential Air-Source Heat Pumps and Central Air Conditioners

Dear Ms. Schmeltz:

The Air Conditioning Division of Rheem Manufacturing strongly supports the continuation of the Energy Star program for central air conditioning and heat pump products and is pleased to provide the following comments regarding the proposed revision to the Energy Star specification criteria.

Efficiency Levels

Rheem encourages EPA to review the equipment efficiency levels in the original draft specification and to not solely rely on the levels already established by CEE, but to review the ARI directory at look at efficiency levels available over all tonnages of equipment. We believe the following is a more reasonable approach to efficiency levels, and would encourage greater participation and (hopefully) increased sales of Energy Star equipment:

	SPLIT SYSTEMS		PACKAGED EQUIPMENT	
	EPA Draft Specification	Proposed Changes	EPA Draft Specification	Proposed Changes
SEER	14.0	N/C	14.0	13.5
EER	8.5	8.2	8.0	N/C
HSPF	12.0	11.5	11.0	N/C

Rheem applauds EPA in removing prescriptive requirements, such as mandating TXVs from the specification. This allows manufacturers to apply their design expertise in the

development of future products to meet energy requirements without being hindered by prescriptive design requirements.

Labeling Provisions

Rheem is extremely concerned with the proposed labeling provisions as they totally exclude HVAC manufacturers from the process. Why would EPA draft a proposal that penalizes manufacturers, who are probably your greatest promoters of Energy Star equipment? Energy Star is a program that has recognition with consumers and, therefore, offers a method for manufacturers to promote their higher efficiency units. If we cannot promote and advertise Energy Star, we would possibly not support the program or specifications with our equipment efficiency design points. We support instead, a possible two-part labeling program. This provides a several advantages:

- Equipment design and efficiency rating requirements by manufacturers ensures equipment meets the program efficiency levels upon leaving the manufacturing facility. This gives utilities a fixed payback upon which they can calculate savings and “rate of return” on their programs. Equipment that has been designed and rigorously tested to meet the Energy Star efficiency specifications, could be labeled as follows when it leaves the factory.



- Quality installation is important as well. This ensures that equipment is installed properly to the performance it was designed to provide. A second label could be affixed to the units if/when the installation was verified to have met all the requirements of an Energy Star installation specification.

This approach will allow Rheem and other equipment manufacturers to continue their involvement and promotion of Energy Star program, and to utilize the Energy Star platform for design criteria and the promoting of high-efficiency products, proper installation and the inherent benefits of each.

Verification

Because this issue is so important, Energy Star should take the steps to make sure this issue is fully researched and the advantages and disadvantages are clearly understood. Questions such as the following must be answered before launching such a program.

- Who does the verification?
 - What are the qualification and certification criteria of those verifiers?
- What is involved in the verification?
 - Owner, installer, servicer, utility, building/ code permit, inspections?
- Who pays for the verification?
- Are there different criteria for product types and/or applications?
 - Splits, packaged units?
- How do you ensure gauges are calibrated for proper charging, airflow?
- If verified, what is the benefit vs. cost?
- Does verification involve more than the equipment, i.e. ductwork, thermostat?
- Does it only apply to the outdoor equipment?
 - Must include rated indoor section. What about furnace?
- How complex will this be?

As proposed, this would be the first and only federal program for onsite inspection of replacement equipment. The practical certification logistics of such do not appear to have been very well conceived or thought out relating to the cost benefits vs. continuing the existing program of certified equipment, consistent with all other Energy Star programs.

There are several industry resources to utilize in establishing such a complex program; however, Rheem cautions against making the program so complex and costly that it becomes too burdensome to implement. We, therefore, recommend that the 2007 date be postponed until all of these questions are answered and EPA is confident a *significantly revised* program can be successful. In the interim, EPA should continue its currently successful program at the revised efficiency levels noted earlier, as this program has proven successful and has the support of all affected parties – manufacturers, consumers, and utilities.

Rheem is happy to work with EPA on the revision of the Energy Star Program and answer any questions you may have. Thank you for the opportunity to respond to these specifications and we look forward to an Energy Star program that addresses our concerns all while promoting and achieving energy efficiency.

Sincerely,

Karen B. Meyers