



2311 Wilson Boulevard Suite 400 Arlington VA 22201 USA
Phone 703 524 8800 | Fax 703 562 1942
www.ahrinet.org

February 23, 2021

Ms. Abigail Daken
Manager, ENERGY STAR HVAC Program
United States Environmental Protection Agency
Washington, DC 20460

(Sent via email to CAC-ASHP@energystar.gov)

Re: AHRI Comments to ENERGY STAR® Final Draft Version 6.0 Central Air Conditioner and Heat Pump (CAC/HP) Specification – Installation Proposal

Dear Ms. Daken:

The Air-Conditioning, Heating, and Refrigeration Institute (AHRI) respectfully submits these comments in response to the United States Environmental Protection Agency (EPA) ENERGY STAR® Final Draft Version 6.0 Central Air Conditioner and Heat Pump (CAC/HP) Specification proposal regarding the installation criteria, issued on January 26, 2021.

AHRI remains concerned with the layers of barriers included in Version 6.0 of the CAC/HP Specifications and cannot support a program that implements numerous prescriptive requirements on top of stringent energy performance levels. The proposed installation criteria for variable speed products adds unnecessary requirements to the most efficient products and eliminates a significant portion from participating in the program. Despite the high efficiency and performance of variable speed systems, these products would lose EnergyStar market differentiation because they do not incorporate ancillary design requirements. Such a result undermines the basic principles of the EnergyStar program. The prescriptive requirements included in Final Draft Version 6.0 and in the January 26th limited proposal should be eliminated.

Additionally, the proposed controls verification procedure (CVP) has not been vetted, therefore repeatability and reproducibility are unknown. Not only is there no validation for the test, as written, the CVP could take days to run.

AHRI recommends EPA make the significant revisions we have suggested in previous comments to maintain an effective program that aligns with the program's Guiding Principles, or sunset the program on December 31, 2022

AHRI appreciates the opportunity to provide these comments. If you have any questions regarding this submission, please do not hesitate to contact me.

Sincerely,

Laura Petrillo-Groh, PE
Senior Regulatory Advisor
Direct: (703) 600-0335
Email: LPetrillo-Groh@ahrinet.org