

Appliance Standards Awareness Project  
American Council for an Energy-Efficient Economy

December 22, 2022

Katharine Kaplan  
Manager, Product Development and Product Administration, ENERGY STAR Labeled Products  
U.S. Environmental Protection Agency  
William Jefferson Clinton Building  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

**RE: ENERGY STAR® Room Air Conditioner Version 5.0 and 6.0 Draft 2 Specification**

Dear Ms. Park,

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP) and American Council for an Energy-Efficient Economy (ACEEE) on the Room Air Conditioner (RAC) Version 5.0 and 6.0 Draft 2 Specification released on November 17, 2022. We appreciate the opportunity to comment.

**We believe that the revised levels in the ENERGY STAR version 5.0 draft 2 specification are appropriate for criteria that will go into effect in October 2023.** We previously expressed support for the ENERGY STAR version 5.0 draft 1 CEER criteria, which aligned with the CEER levels proposed by DOE in the April 2022 notice of proposed rulemaking (NOPR).<sup>1</sup> While there will likely be significant innovation in the marketplace in advance of compliance with amended federal energy conservation standards in 2026, we understand the concern that the ENERGY STAR levels proposed in the draft 1 specification may not reflect the efficiency of RACs that would be available for purchase for the 2024 cooling season.

For most product classes, the revised ENERGY STAR version 5.0 draft 2 specification levels are equivalent to the 2022 ENERGY STAR Most Efficient criteria,<sup>2</sup> which require models to be at least 35% more efficient than the current federal energy conservation standards for RACs.<sup>3</sup> We believe that the draft 2 levels will likely still encourage the adoption of variable-speed equipment in the marketplace, which would drive large energy savings. We therefore think that the minimum efficiency requirements for RACs in the ENERGY STAR version 5.0 draft 2 specification will appropriately recognize efficient models within the marketplace in the near-term.

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<sup>1</sup> <https://www.regulations.gov/document/EERE-2014-BT-STD-0059-0031>

<sup>2</sup> We note that these levels were retained in the 2023 ENERGY STAR Most Efficient criteria.

<sup>3</sup> We note that EPA retained the stringency for product classes 1, 2, 6, and 7 between versions. The proposed levels for these product classes could be met with a single-speed compressor.

We appreciate EPA's recognition of the future market in establishing initial criteria for ENERGY STAR version 6.0. However, we encourage EPA to maintain flexibility and continue to assess the market as the compliance date of the amended federal standard approaches.

Thank you for considering these comments.

Sincerely,



Rachel Margolis  
Technical Advocacy Associate  
Appliance Standards Awareness Project



Jennifer Amann  
Senior Fellow  
American Council for an Energy-Efficient  
Economy