



Air Conditioning Contractors of America

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November 5, 2017

The Honorable Greg Walden, Chairman
U.S. House of Representatives
Committee on Energy and Commerce
Washington, DC 20515

The Honorable Frank Pallone, Jr.
Ranking Member
U.S. House of Representatives
Committee on Energy and Commerce
Washington, DC 20515

The Honorable Fred Upton, Chairman
U.S. House of Representatives
Committee on Energy and Commerce
Subcommittee on Energy
Washington, DC 20515

The Honorable Bobby Rush, Ranking
Member
U.S. House of Representatives
Committee on Energy and Commerce
Subcommittee on Energy
Washington, DC 20515

Dear Chairmen Walden and Upton, and Ranking Members Pallone and Rush:

Thank you for your leadership on energy efficiency programs. As your committee considers legislation to amend the ENERGY STAR program, we wanted to share with you our support for the current management of the program as well as our perspective on the program, as the national trade association representing more than 600,000 heating, ventilation, air conditioning, and refrigeration (HVACR) professionals in every state.

For more than fifty years the Air Conditioning Contractors of America (ACCA) has played a leadership role in energy efficiency issues, and has worked side-by-side with the Environmental Protection Agency (EPA) and the Department of Energy (DOE). We have developed numerous HVACR industry standards – recognized by the American National Standards Institute (ANSI) – that are widely accepted industry practices. Many ACCA standards are included in national, state, and local building codes.

ACCA strongly supports investing in energy efficiency. However, unlike other groups who champion energy efficiency by simply work to create a new standard or believing that exchanging older HVACR systems for the newest ENERGY STAR efficient units, ACCA has long recognized that increased energy efficiency in HVAC equipment is not so simple. HVACR systems are not “plug-and-play” appliances like a refrigerator, dishwasher or even a ceiling fan, and the singular focus on lab-tested efficiencies has gone on far too long for non-plug-in-play equipment like HVAC systems and must be addressed.

For energy efficiency investments to work, the focus and mindset must change from the misguided lab-tested efficiency to realized, or installed efficiency of HVACR equipment. These mechanical systems are very complex and require skilled technicians to properly size equipment, ensure the ducts are designed to deliver precise airflow, and to provide adequate refrigerant charges. If these basic elements are not followed, then indoor air quality is jeopardized, the

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intended performance gains are not realized, and a significant amount of energy is wasted – even by highly efficient ENERGY STAR products.

The EPA believes that half of U.S. homes suffer from HVAC systems not being installed to the equipment manufacturer's minimum installation requirements. This lack of consumer focus on HVAC installation has resulted in the average home and light commercial HVAC system being 2x the size it needs, and ducts ½ the required size, which has resulted in the average 14 SEER system operating at just 8-10 SEER.

Despite our best efforts DOE continues to not recognize this problem, and help consumers understand the importance of proper installation when it comes to equipment which is the largest consumer of energy in our country. HVAC manufacturers are producing highly efficient products, meeting and exceeding DOE's regulatory demands. However, DOE does not require minimum installation and design standards that manufacturers recommend. Despite DOE knowing that not properly installing a new air conditioning unit or heat pump, it will consume 30 percent more energy than it should, and its lifespan will decrease significantly, they have done nothing to address the problem for consumers.

The problem of poor HVAC installations is rampant in part due to many public officials at DOE believing that industry-recommended installation standards and training programs are aspirational and do not require trained technicians. If DOE would educate and incentivize homeowners to demand that HVAC systems are installed according to the industry's recommended minimum standards, including proper equipment sizing, ducts re-design and sealing, and appropriate refrigerant charges then our industry would immediately be able to provide a 30 percent improvement in efficiency for the equipment that is the largest consumer of energy in our country.

Thankfully EPA, has taken a proactive approach to addressing the installation issue. EPA established the ENERGY STAR Verified Installation (ESVI) Program highlighting the importance of quality HVAC installation practices. This understanding that EPA has that even cutting-edge ENERGY STAR heating, ventilation, and air conditioning technologies, if improperly installed, may fail to realize important benefits for homeowners has been critical. EPA's program follows the ANSI / ACCA 5 QI Standard (*HVAC Quality Installation Specification*) – the minimum design and installation requirements for residential and commercial HVAC applications – to address the efficiency problems caused by improper installations of HVAC systems.

Perhaps efforts to move the ENERGY STAR program might be better served helping ensure EPA has the resources to better promote quality installation practices, and getting to the bottom of why DOE has not been working to address this. These quality installation practices are supported by the 11-member HVACR Industry Alliance, made up of engineers, manufacturers, contractors, and distributors, all who support properly installing HVACR equipment – which will provide lasting benefits to consumers and tax payers.

ACCA's members are serious about promoting energy efficiency and helping consumers realize the benefits of their investments in highly efficient ENERGY STAR HVACR products. In fact,

this has become the top priority for our members, and our association. Just last month, we held a *HVAC 101 For Congress* breakfast briefing here in this very Committee, in an attempt to shine a spotlight on the need to focus on realized efficiency, and installation when it comes to HVAC equipment.

As your committee tackles a number of pressing issues for our nation, we ask that you and all the members of this committee become advocates for quality installation practices of HVACR systems, and help ensure consumers get what they are paying for when investing in ENERGY STAR HVAC equipment. Despite all the work that needs to be done to address the installation issue, we are confident any change to DOE for management of the ENERGY STAR program would further weaken or completely dismantle the progress EPA has made to help consumers address HVAC installation.

Please let us know how we can provide any assistance as you consider important energy legislation, in particular that which would impact the indoor energy efficiency environment, and the HVAC industry. It would be an honor to work with you to advance changes that would improve and expand EPA's ESVI Program.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Barton C. James". The signature is fluid and cursive, with the first name being the most prominent.

Barton C. James
Senior Vice President of Government Relations
Air Conditioning Contractors of America