Department of Energy
Washington, DC 20585

March 4, 2011

Ms. Leslie Jones
ENERGY STAR Program
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Room 62023
Washington, DC 20460

Dear Ms. Jones:

On February 7, 2011, the United States Department of Energy (DOE) notified Friedrich Air Conditioning Company (Friedrich) that DOE had completed testing of the Friedrich room air conditioner model CP15F10 under the ENERGY STAR Testing Pilot Program and confirmed that the model did not meet the ENERGY STAR energy-efficiency requirement of 10.7 EER. DOE gave Friedrich until February 28, 2011, to provide conclusive manufacturing or design evidence or quality assurance information on why DOE testing showed that this product did not meet the ENERGY STAR Program's energy-efficiency.

On February 28, 2011, Friedrich replied stating that the initial Stage 1 tested unit would have "met both capacity and energy performance" if the barometric pressure correction[1] had been applied. Friedrich appears to be applying a 5% tolerance in making this argument, as the EER of the Stage 1 unit after applying the correction would have been 10.19. Following this initial test, however, DOE tested a total of 4 units, with consistent test results of 10.1 EER.

DOE has determined that Friedrich room air conditioner model CP15F10 does not meet the ENERGY STAR requirements.[2] Accordingly, DOE is referring this matter to EPA, the brand manager for ENERGY STAR, for appropriate action. Please feel free to contact Laura Barhydt of my staff at 202-287-5772 should you require any further information.

Sincerely,

Timothy G. Lynch
Deputy General Counsel for
Litigation and Enforcement

cc: Mr. W. Patrick Kendrick
Friedrich Air Conditioning Co.
PKendrick@friedrich.com

[1] At the time that these models were rated and tested, the DOE test procedure did not include an adjustment for barometric pressure. As of February 7, 2011, DOE's test procedure includes a barometric pressure adjustment.
[2] Applying the barometric pressure adjustment would not result in a different finding.

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