



Department of Energy

Washington, DC 20585

August 18, 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 July 6, 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 July 26, 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 requirement.

In a letter to DOE, Friedrich stated that DOE should have applied the capacity correction factor for barometric pressure reflected in Section 6.1.3 of ANSI/ASHRAI Standard 16-1983 (RA 2009) (Standard 16).¹ In Friedrich's view, if DOE had applied this correction to the unit it initially tested, the unit would have satisfied the ENERGY STAR Program's requirements and further testing by DOE would have been unwarranted.

Although not a part of the valid test procedure at the time of the test, DOE recalculated the test results from the initial unit and three additional units using Standard 16's capacity correction factor. The recalculated EER value still did not satisfy the ENERGY STAR Program's specifications.

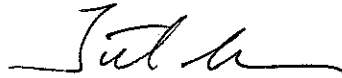
By letter dated March 4, 2011, DOE referred Friedrich room air conditioner model CP15F10 to EPA based on test results for four units. In consideration of the capacity correction argument set forth by Friedrich, DOE tested a fifth unit using the DOE test procedure effective February 7, 2011. The results from testing all five units confirm that room air conditioner model CP15F10 does not satisfy the ENERGY STAR Program's energy-efficiency specifications.

¹ As of February 7, 2011, DOE has amended its regulations to incorporate Standard 16 as the standard test procedure for room air conditioner energy efficiency certification testing. 76 FR 972, 975 (Jan. 6, 2011). The prior test procedure, which was valid when DOE tested the initial unit and three additional units, did not incorporate this capacity correction factor.



For these reasons, DOE has determined that Friedrich room air conditioner model CP15F10 does not meet the ENERGY STAR requirements. Accordingly, DOE is referring this matter back to EPA, the brand manager for ENERGY STAR, for appropriate action. Please feel free to contact Laura Barhydt, Assistant General Counsel for Enforcement, at 202-287-5772 should you require any further information.

Sincerely,

A handwritten signature in black ink, appearing to read "T. Lynch", with a long horizontal flourish extending to the right.

Timothy G. Lynch
Deputy General Counsel for
Litigation and Enforcement

cc: Mr. W. Patrick Kendrick, Friedrich Air Conditioning Co.
Mr. John Hodges, Esq., Counsel for Friedrich