

May 31, 2021

Laureen Chung
Equipment Division
Office of Energy Efficiency
Natural Resources Canada
930 Carling Avenue, Building 3, 1st Floor
Ottawa, Ontario
K1A 0Y3

**RE: Preliminary Stakeholder Comment – Energy Efficiency Regulations – Technical Bulletin
Central AC/HP – 2021**

Dear Ms. Chung:

This letter constitutes the comments of Efficiency Canada and the Appliance Standards Awareness Project (ASAP) on the Natural Resources Canada (NRCan) May 2021 technical bulletin on amending the standards for central air conditioners and heat pumps.

Efficiency Canada is the national voice for an energy efficient economy. We are a research and advocacy organization housed at Carleton University's Sustainable Energy Research Centre.

ASAP organizes and leads a broad-based U.S. coalition effort that works to advance, win, and defend new appliance, equipment, and lighting standards that deliver large energy and water savings, monetary savings, and environmental benefits. ASAP is led by a steering committee that includes representatives from energy and water efficiency organizations, the environmental community, consumer groups, utilities, and state government. We were deeply involved in the U.S. process that resulted in the central air conditioner and heat pump standards that take effect in the U.S. in 2023.

We support the requirements being considered for central air conditioners and heat pumps as outlined in the technical bulletin. In the technical bulletin, NRCan is proposing to harmonize with the testing standard that manufacturers will be required to use in the U.S. as of January 1, 2023 (Appendix M1) with two adjustments to accommodate the Canadian climate: making the optional -15°C (5°F) test point in the U.S. DOE test procedure mandatory, and basing the HSPF2 metric on Climate Region V. NRCan is also proposing to harmonize with the January 2023 SEER2 and HSPF2 standards in the U.S. with adjustments to the HSPF2 levels to reflect Region V. Finally, NRCan is proposing to update the reporting requirements to include, among other information, HSPF2 for Region V, COP at -15°C (5°F) at rated capacity, and rated capacity at -15°C (5°F).

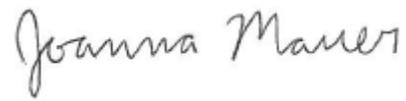
NRCan's proposed adjustments to the U.S. DOE test procedure and to the HSPF2 levels will help ensure that the test procedure and efficiency standards appropriately reflect the Canadian climate. Furthermore, the reported values for HSPF2 for Region V and COP and capacity at -15°C (5°F) will provide valuable information for consumers for making purchasing decisions and for utility programs to be able to incentivize heat pumps that provide good cold-climate performance. The information about cold-climate performance could also provide spillover benefits for cold climate regions in the U.S.

Thank you for considering these comments.

Sincerely,

A handwritten signature in black ink that reads "B Haley". The signature is written in a cursive style with a large, prominent initial "B".

Brendan Haley, PhD
Policy Director
Efficiency Canada

A handwritten signature in black ink that reads "Joanna Mauer". The signature is written in a cursive style with a large, prominent initial "J".

Joanna Mauer
Technical Advocacy Manager
Appliance Standards Awareness Project