



# Air Conditioning Contractors of America

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April 12, 2012

Pennsylvania Public Utility Commission  
Attention: Secretary  
PO Box 3265  
Harrisburg, PA 17105-3265

Re: Comments on Secretarial Letter, Docket Number M-2012-2289411

Dear Pennsylvania Public Utility Commission Secretary,

I am writing to you on behalf of the more than 4,000 member companies of the Air Conditioning Contractors of America (ACCA) who employ approximately 60,000 people. The Pennsylvania Chapters of ACCA include a large group of contractors employing a significant amount of these people. Every day, ACCA members in Pennsylvania are designing, installing, and maintaining highly efficient heating, ventilation, and air conditioning (HVAC) equipment and cost effective indoor environmental systems.

We read with great interest your March 17, 2012, Secretarial Letter requesting comments on the Pennsylvania Public Utility Commissions future plans for a Phase 2 of the EE&C programs. While we agree with your goals, we believe it's vital that HVAC efficiency programs be a primary element in Phase 2. When considering ways to increase a building's energy efficiency, HVAC retrofits are an ideal method to make these improvements. As documented by the U.S. Department of Energy, HVAC and water heating comprises more than 50% of a home's overall energy usage.

It is well recognized that improper installations can result in system efficiency reduction of 30 percent or more. Thus, ACCA strongly recommends that you require mechanical contractors to adhere to practices detailed in the industry-developed, ANSI-recognized standards:

- ANSI/ACCA 5 Q1 – 2010 (*HVAC Quality Installation Specification*) addresses proper design aspects, equipment installation aspects, system documentation and owner education aspects.
- ANSI/ACCA 4 QM – 2007 (*Maintenance of Residential HVAC Systems*) details necessary inspection and maintenance for residential HVAC systems and assists contractors with proper maintenance.
- ANSI/ACCA 12 QH – 2011 (*Existing Home Evaluation and Performance Improvement*) establishes the minimum requirement to evaluate a residence with regards to energy efficiency, water conservation, occupant comfort, and indoor air quality. From this evaluation, improvement opportunities are presented to the client so that they can select improvements that meet their needs. The standard describes the minimum requirements

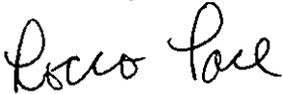
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for those that effect the selected improvements, and the subsequent verification that the performed work is in compliance to industry standards.

The ACCA 5 QI Standard is the basis for HVAC-related EnergyStar Programs being effected by the U.S. Department of Energy and the U.S. Environmental Protection Agency for new and existing homes. Additionally, the ACCA 5 QI and ACCA 4 QM Standards are being implemented by a number of U.S. utilities. These are aimed at ensuring consumers receive the intended benefits from their heating and cooling systems in an energy efficient manner.

We thank you for your consideration and hope Phase 2 has an even stronger HVAC focus to assist utilities and home owners decrease their overall energy usage. We would like the opportunity to meet to provide additional insight on our recommendations if needed. Should you have any questions, please contact me personally at the contact information below.

Sincerely,

A handwritten signature in black ink that reads "Rocco Pace". The signature is written in a cursive, flowing style.

Rocco Pace  
President, DVC-ACCA  
J.M. Oliver's Heating and Cooling  
610-496-2387  
rpace@oliverhvac.com

cc: Darren Gill