

Brussels, 10 February 2014

Dear Mr. González Álvarez,

EPEE and Eurovent would like to thank you for the possibility to provide a proposal on the product group of rooftops, which you can find in the following.

We remain at your disposal for any questions or comments you may have.

Kind regards,

Andrea Voigt,
Director General EPEE
a.voigt@epeeglobal.org

Felix van Eyken
Secretary General, Eurovent
felix.vaneyken@eurovent-association.eu

Rooftops

Rooftops are the traditional solution to provide cooling/heating of large single zone areas in single story buildings such as supermarkets and warehouses. EPEE and Eurovent are very concerned that rooftops will not be able to meet the proposed minimum energy efficiency requirements.

Latest Eurovent data on the seasonal energy efficiency (SEER) from all participants to Rooftop certification program, confirm this concern and show that among 172 rooftop models, 0% comply with Tier 1 and Tier 2 requirements as currently proposed by the European Commission.



EPEE and Eurovent therefore urge the Commission to adapt and lower the requirements accordingly and to apply the same level of ambition for MEPS as for air conditioners and chillers.

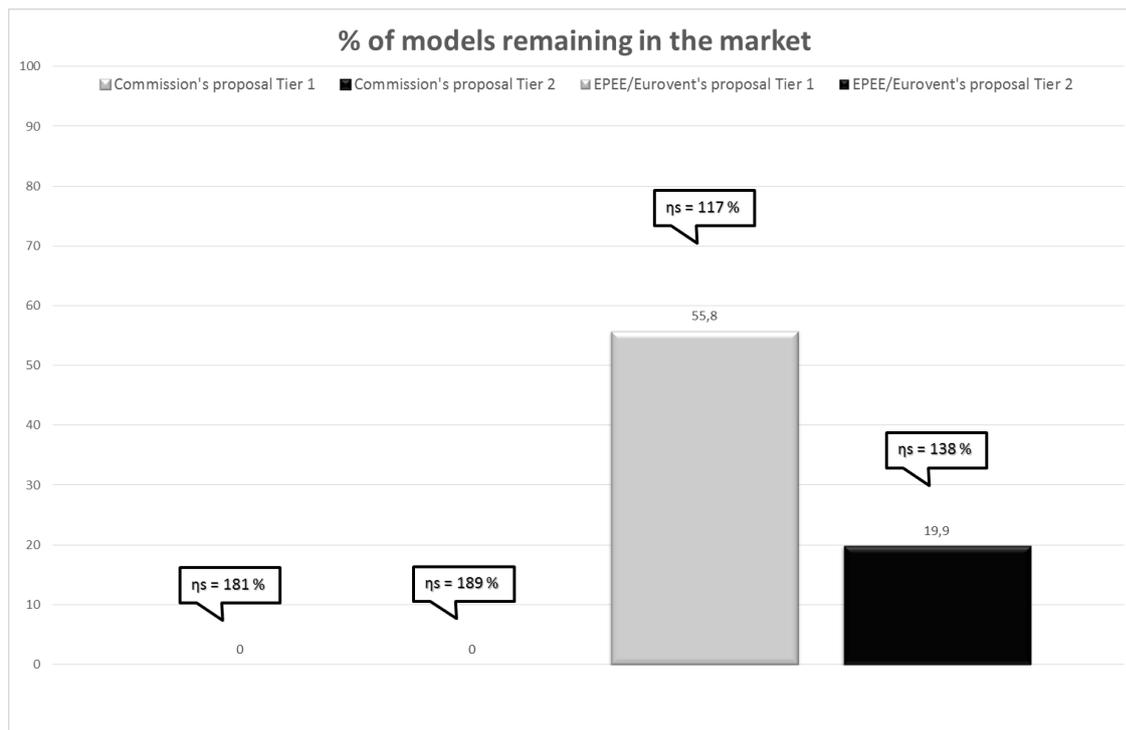
Proposed solution:

EPEE/Eurovent		
Product group	Tier 1	Tier 2
Rooftops	117%	138%

According to the latest Eurovent data on rooftops, $\eta_s \geq 138\%$, as suggested for Tier 2 would remove 80% of all rooftops from the market and $\eta_s \geq 117\%$ for Tier 1 would remove 44% from the market.

The timing between the two Tiers should be increased to 4 years, also in line with chillers and air-conditioners.

This is an ambitious challenge for manufacturers, as proposed minimum efficiency requirements for tier 2 would keep less products than those using BAT today. In other words using BAT will be necessary but not sufficient to stay on the market after tier 2.



EPEE and Eurovent are confident that this proposal will achieve the energy savings that the European Commission has targeted.

In addition to this proposal, EPEE and Eurovent would like to reiterate the following points:

- Improvement options are already implemented today**

EPEE and Eurovent emphasize that the improvement options as outlined in Task 6 of the Preparatory Study are already reality today. Some rooftop models already use the most efficient compressor arrangement (tandem or trio compressors), the most efficient heat exchangers and the most efficient fan technology (variable speed fan with premium efficiency EC motors) that are currently available on the market. **EPEE and Eurovent consider that all units above 138% efficiency already feature best in class technologies today.** While EPEE and Eurovent members continuously strive for more efficient products, currently there is no room for efficiency improvement of these products in cooling mode.
- Comparability of heating technologies and uptake of renewables**

A major part of rooftop models feature reversible technology. As is the case for cooling, EPEE and Eurovent expect the seasonal heating efficiency (SCOP) of rooftops also to be significantly lower than indicated in the study. Consequently, requirements for heating need to be lowered accordingly to ensure comparability of different heating technologies and the uptake of renewable and energy efficient equipment. This implies as well that requirements for air-heating products under ENER Lot21 need to be comparable to other heating technologies such as covered by ENER Lot1 (space heaters, biomass boilers, etc.).

In conclusion, reducing the energy efficiency requirements for rooftops as well as for ducted air conditioning packages is indispensable to ensure a level playing field, competitiveness and the promotion of renewable energy sources whilst maintaining an adequate level of ambition.