

TABLE FOR COMMENTS

Name of submitter: Sandrine MARINHAS

Affiliated organization of the submitter (if any): Eurovent Certita Certification

Contact email of submitter: s.marinhas@eurovent-certification.com

0	1	2	3	4	5	6
#	Para No./ Annex / Figure / Table	Line Number	Type of comment ge = general te = technical ed = editorial	Comment (including justification for change)	Proposed change (including proposed text)	Assessment of comment (to be completed by UNFCCC secretariat)
1	NA	NA	te	It seems references to European regulations (EU) No 206/2012 and (EU) No 626/2011 regarding definitions and minimum requirements for room air conditioners. These should be added. See http://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1471954866669&uri=CELEX:32012R0206 and http://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1471954987904&uri=CELEX:32011R0626	Standards associated with the corresponding EU regulations given above are EN 14511 regarding determination of performances (EER and COP) and EN 14825 for seasonal data (SEER and SCOP) See http://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1397827730589&uri=CELEX:52014XC0411(02)	
2	NA	NA	te	Role and interest of certification is missing.	Add for example: In the EU air conditioners are certified since the 90's by the accredited body Eurovent Certita Certification, who annually organises tests in independent laboratories of performance of numerous units per manufacturer. It allows verification of declared performance and rerating of catalogues when failures are detected.	
3	16.	(d)	te	Certification of products is defined in ISO 17065. To be verified that assessment made by the laboratories is indeed certification.	...the laboratory certifies-assesses the annual electricity consumption ant the Energy Efficiency Index.	

Template for comments

Date: 3/11/2016

Document:

0	1	2	3	4	5	6
#	Para No./ Annex / Figure / Table	Line Number	Type of comment ge = general te = technical ed = editorial	Comment (including justification for change)	Proposed change (including proposed text)	Assessment of comment (to be completed by UNFCCC secretariat)
4	16.	(h)	te	Definition of EER shall refer to ISO 5151 but also to EN 14511 (see comment 1)	All EER information refers to a test standard (EN 14511 or ISO 5151)	
5	16.	(i)	te	Definition of SEER shall refer EN 14825 (see comment 1)	Add at the end of the §: In the EU ESEER information refers to test standard EN 14825	
6	16.	Between (j) and (k)	te	Definition of SCOP is missing. It shall refer EN 14825 (see comment 1)	Add before "For example...": Seasonal Coefficient of Performance (SCOP) for air conditioners is derived from the COP by weighing for different part load periods of the year. It is a legally required parameter in Europe, referring to EN 14825, reported in Watt/Watt.	
7	Table 1		ed	Subscript avr,y is not clearly defined		
8	28.	β_L	te	Source of default values of β_L is missing.		
9	28.	EFgrid	ed/te	Definition of EFgrid is missing for eq. (7)		
10	28.	EER _{avr,y} or SEER _{avr,y}	te	It seems there is a misunderstanding of the meaning of SEER Note that $hrs_y \times \beta_L / EER_{avr,y}$ is "equivalent" to $1/SEER_{avr,y}$	Divide in two equations, once with $hrs_y \times \beta_L / EER_{avr,y}$, second time with $1/SEER_{avr,y}$	
11	29.		te	EU doesn't use ISO 5151. Accuracy of conversion factors are questionable. It could influence final results by several % if not realistic.	Add : ...South Korea, and USA and the EU... Add if available conversion coefficients for the EU data.	
12	29.		te	"Equation 7 applies to only EER or only SEER" to be modified according to modifications in eq. (7)		
13	36.		te	EU doesn't use ISO 5151.		
14	36.		te	Refer to Appendix 3 for conversion between SEER of each country ? Accuracy of tables given in Appendix 3 are questionable. It could influence final results by several % if not realistic.		
15	Table 13		te	Modify line regarding "Measurement Procedures" according to modifications suggested above.		

Template for comments

Date: 3/11/2016

Document:

0	1	2	3	4	5	6
#	Para No./ Annex / Figure / Table	Line Number	Type of comment ge = general te = technical ed = editorial	Comment (including justification for change)	Proposed change (including proposed text)	Assessment of comment (to be completed by UNFCCC secretariat)
16	Table 13		ed	I would expect to find in the line "Measurement Procedures" of the table information about the applicable standards.		
17	App. 3		te	Accuracy of tables given in Appendix 3 are questionable. It could influence final results by several % if not realistic.		