

TABLE 2.—STEADY-STATE COMBINED OPERATION & WATER DRAW SCHEDULE—Continued

Sequence	
8	HEAT PUMP AND RESISTIVE OPERATE ON INTERNAL CONTROLS (heat pump continues to operate in space conditioning mode).
9	t=68 MINUTES, DRAW 16.1 GALLONS.
10	HEAT PUMP AND RESISTIVE OPERATE ON INTERNAL CONTROLS (heat pump continues to operate in space conditioning mode).
11	t=118 MINUTES, DRAW 10.7 GALLONS.
12	HEAT PUMP AND RESISTIVE OPERATE ON INTERNAL CONTROLS TO CONCLUSION OF WATER HEATING.

TABLE 3.—CYCLIC COMBINED OPERATION & WATER DRAW SCHEDULE

Sequence	
1	FILL WATER HEATER (or draw until both upper and lower thermostat water temperatures are below their turn on points).
2	RESISTIVE OPERATION TO CONCLUSION.
3	HEAT PUMP OPERATION TO CONCLUSION OF WATER HEATING.
4	CONDITION WITH 11 GALLON DRAW.
5	HEAT PUMP AND/OR RESISTIVE OPERATION TO CONCLUSION OF WATER HEATING.
6	COMPRESSOR OFF FOR 10 MINUTES.
7	t=0 , DRAW 5.4 GALLONS.
8	t=10 MINUTES, Tstat ON; @ t=20 MINUTES, Tstat OFF.
9	t=30 MINUTES, Tstat ON; @ t=40 MINUTES, Tstat OFF.
10	t=50 MINUTES, Tstat ON; @ t=60 MINUTES, Tstat OFF.
11	t=68 MINUTES, DRAW 16.1 GALLONS.
12	t=70 MINUTES, Tstat ON; @ t=80 MINUTES, Tstat OFF.
13	t=90 MINUTES, Tstat ON; @ t=100 MINUTES, Tstat OFF.
14	t=110 MINUTES, Tstat ON.
15	t=118 MINUTES, DRAW 10.7 GALLONS.
16	t=120 MINUTES, Tstat OFF.
17	t=130 MINUTES, Tstat ON; @ t=140 MINUTES, Tstat OFF.
18	t=150 MINUTES, Tstat ON; @ t=160 MINUTES, Tstat OFF.
19	t=170 MINUTES, Tstat ON TO CONCLUSION OF WATER HEATING.

Note: Tstat refers to indoor space thermostat.

TABLE 4.—DEDICATED WATER HEATING OPERATION & WATER DRAW SCHEDULE

Sequence	
1	FILL WATER HEATER (or draw until both upper and lower thermostat water temperatures are below their turn on points).
2	RESISTIVE OPERATION TO CONCLUSION.
3	HEAT PUMP OPERATION TO CONCLUSION OF WATER HEATING.
4	CONDITION WITH 11 GALLON DRAW.
5	HEAT PUMP AND/OR RESISTIVE OPERATION TO CONCLUSION OF WATER HEATING.
6	COMPRESSOR OFF FOR 10 MINUTES.
7	t=0 , DRAW 5.4 GALLONS.
8	HEAT PUMP AND RESISTIVE OPERATE ON INTERNAL CONTROLS.
9	t=68 MINUTES, DRAW 16.1 GALLONS.
10	HEAT PUMP AND RESISTIVE OPERATE ON INTERNAL CONTROLS.
11	t=118 MINUTES, DRAW 10.7 GALLONS.
12	HEAT PUMP AND RESISTIVE OPERATE ON INTERNAL CONTROLS TO CONCLUSION OF WATER HEATING.

January 24, 1995.

The Assistant Secretary for Conservation and Renewable Energy,

United States Department of Energy, 1000 Independence Avenue, S.W., Washington, DC 20585.

Subject: Petition For Waiver and Application for Interim Waiver.

Gentlemen: This is a Petition for Waiver and Application for Interim Waiver submitted pursuant to Title 10 CFR 430.27, as amended November 14, 1986. Waiver is requested from the existing Test Method for Measuring the Energy Consumption of Central Air Conditioners, including heat pumps as found in Appendix M to Subpart B of Part 430.

Under the existing Test Procedure, heat pump energy consumption is measured relative only to space heating and cooling. NORDYNE requests a waiver to the existing test procedure as detailed in the attached "Requested Test and Rating Procedure Modifications for Electrically Driven, Single-Speed Compressor, Air-to-Air Heat Pumps With Integrated Water Heating", for use in the testing and rating of its Powermiser line of heat pumps which include special design characteristics to incorporate domestic water heating.

The current test procedure clearly cannot account for the energy savings associated with integrated water heating.

NORDYNE is confident that a waiver will be granted and requests that an interim

waiver be granted. NORDYNE's confidence is based on:

(1) The current test procedure does not account for the total energy savings of the Powermiser.

(2) Carrier Corporation has been granted a similar waiver for its Hydrotech product.

(3) For public policy, the widespread use of this type of integrated appliance would be in direct support of the President's Climate Change Action Plan, which lists heating and cooling and home appliances as key targets for improvement.

(4) Absent a favorable determination on the Application for Interim Waiver, NORDYNE would experience an economic hardship, as discussed in the confidential attachment.