

February 25, 2008

Office of Federal Procurement
Office of Management and Budget
Room 9013
725 17th Street, NW
Washington, DC 20503

RE: Proposed OFPP Policy Letter

Dear Sir or Madam,

On behalf of Trane, Inc., I am pleased to submit these comments on the above-referenced subject, the “Acquisition of Green Products and Services”, proposed on December 28, 2007 (72 Federal Register 73904).

Trane Inc. provides heating, ventilation and air conditioning (HVAC) systems and services that enhance the quality and comfort of the air in homes and buildings around the world. The company offers customers a broad range of energy-efficient HVAC systems; dehumidifying and air cleaning products; service and parts support; advanced building controls; and financing solutions. The company’s HVAC systems and services have leading positions in premium commercial, residential, institutional and industrial markets; a reputation for reliability, high quality and product innovation; and a powerful distribution network. Trane’s 2007 annual revenues were approximately \$7.45 billion and the company has more than 29,000 employees worldwide. Until last year, Trane was part of the American Standard Companies. American Standard separated its businesses in 2007, and on November 28, 2007, the company officially changed its name to Trane, Inc.

Ozone Depletion

The proposal would require that only refrigerants with non-ozone depleting potential (ODP) be used in HVAC applications. We believe the proposal is misguided in this respect, and that federal procurement policy should consider other factors as well, such as global warming potential (GWP), energy efficiency and leak rate.

The U.S. Green Building Council (USGBC) made changes to its refrigerant selection process in its LEED – New Construction (NC), Version 2.2, published in December 2005. In NC 2.2, LEED recognized that viewing refrigerants only through the prism of ODP did not always provide the best outcome for the environment. So the LEED policy considers not only ODP, but also GWP, volume of refrigerant used, and leakage rate (energy efficiency is considered elsewhere in the LEED-NC system).

EPA [December 2002] published a document entitled, “Building Owners Save Money, Save the Earth: Replace Your CFC Air Conditioning Chiller”. It encourages building owners to consider more than ODP in choosing a refrigerant.

Several refrigerants are environmentally acceptable. However, if you want the highest environmental performance, follow the 'Responsible Use' criteria, focusing on Life-Cycle Climate Performance (LCCP), not the refrigerant. LCCP takes into account the emissions during the manufacturing of the refrigerant, the transportation to the site, during charging of the chiller, lifetime leakage, and finally disposal. And, very importantly, this calculation must include emissions from the generation of electricity to power the chillers and account for any additional energy that may be necessary to assure safe operation.

For these reasons, we recommend the OFPP consider characteristics of a refrigerant other than ODP. At a minimum, these other characteristics should include GWP, energy efficiency, leak rate, and safety. We recommend the OFPP instead adopt the EPA SNAP regulations as its basis for refrigerant selection. By using SNAP, the OFPP will automatically incorporate changes in any phase out requirements that may be imposed on refrigerants by the Montreal Protocol or the Clean Air Act.

Energy Efficiency

We strongly support the proposal's focus on energy efficiency, and believe it ought to be incorporated into refrigerant selection (as noted above).

ESPCs

We strongly support the proposal to encourage government agencies to achieve energy savings through the use of energy saving performance contracts (ESPCs). ESPCs are an excellent way for the government to save energy and save money.

We would welcome the opportunity to discuss this with you in more detail.

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