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January 6, 2011

Rob Hudler
California Energy Commission
1516 Ninth Street, Mail Stop 39
Sacramento, CA 95814

RE: Application for Approval of Exceptional Method for Daikin Altherma System under
24 C.C.R. § 10-109.b(4)

VIA FEDERAL EXPRESS

Dear Mr. Hudler:

This responds to Alan Marshall's letter to Daikin AC (Americas), Inc. ("Daikin") dated September 30, 2010, regarding our pending application for approval of a Title 24 exceptional method for the Daikin Altherma System.

After carefully reviewing the letter and considering our subsequent telephone discussions with Alan Marshall and with you, we have decided to pursue the Option A compliance modeling approach suggested in Alan's September 30 letter. In developing our detailed compliance modeling proposal, we relied heavily on the additional guidance that you provided in our December 7 conference call. The resulting proposal is attached to this letter with the required values provided in table format for Daikin's Altherma models being offered for sale in California. The calculation of these energy descriptors is explained in the "Proposal" boxes contained in the attachment. Daikin has performed this analysis for HSPF, SEER and DHW calculations.

Please let us know if our compliance modeling proposal is likely to be acceptable as soon as possible. Assuming that the attached proposal is adequate to proceed, Daikin would like the Commission staff to schedule the public workshop on our exceptional method application as soon as possible, preferably in early 2011.

Please contact either Mark Stanga at 202-669-2002 (mstanga@verizon.net) or me at 972-245-1510 (lee.smith@daikinac.com) if you have any questions about Daikin's proposed compliance modeling methodology, or if you require additional information. Thank you for your consideration of this matter.

Sincerely,

Lee Smith
Asst Vice President – Residential Solutions