

May 16, 2024

Ms. Abigail Daken
Manager, ENERGY STAR HVAC Program
United States Environmental Protection Agency
Washington, DC 20460

(Sent via email to: HVAC@energystar.gov)

Re: AHRI Comments to ENERGY STAR® Residential Central Air Conditioners Updated
Sunset Proposal

Dear Ms. Daken:

The Air-Conditioning, Heating, and Refrigeration Institute (AHRI)¹ respectfully submits these comments in response to the United States Environmental Protection Agency (EPA) ENERGY STAR Residential Central Air Conditioners (CAC) Updated Sunset Proposal, issued on April 16, 2024.

AHRI remains opposed to EPA's proposal to remove CACs from the ENERGY STAR Version 6.1 Specification for CAC and Heat Pump (HP) Equipment. ENERGY STAR labeled residential CACs will continue to meet principles outlined in the ENERGY STAR's Strategic Vision and Guiding Principles.² The Guiding Principles acknowledge that, "it is typically possible to achieve the necessary balance among principles by selecting efficiency levels reflective of the top 25 percent of models available on the market when the specification goes into effect."³

The sunset of the CAC specification ignores incentives for markets that do not require space heating, including Home Energy Rebates included in the Inflation Reduction Act.⁴ CACs still hold a significant market share, and it is appropriate that the EPA specification, recognizing high efficiency products, remain in effect. EPA should conduct the necessary analysis to

¹ AHRI represents more than 330 manufacturers of air conditioning, heating, and refrigeration (HVACR) equipment. It is an internationally recognized advocate for the HVACR industry and certifies the performance of many of the products manufactured by its members. In North America, the annual economic activity resulting from the HVACR industry is more than \$211 billion. In the United States alone, AHRI member companies, along with distributors, contractors, and technicians employ more than 704,000 people.

² ENERGY STAR® Products Program Strategic Vision and Guiding Principles, May 2012, https://www.energystar.gov/ia/partners/prod_development/downloads/ENERGY_STAR_Strategic_Vision_and_Guiding_Principles.pdf?0a0a-3f14.

³ *Id* at Page 2.

⁴ <https://www.energy.gov/scep/home-energy-rebates-programs>.

understand the current and estimated market penetration for CACs before proposing such drastic measures.

We recommend EPA continue a program grounded in ENERGY STAR®'s Guiding Principles, and *not* sunset the certification pathway for residential CACs.

AHRI appreciates the opportunity to provide these comments. If you have any questions regarding this submission, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'LPG' with a stylized flourish.

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