



May 16, 2024

Abigail Daken, EPA Product Manager
ENERGY STAR for HVAC
U.S. Environmental Protection Agency
William Jefferson Clinton Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Topic: Sunset of ENERGY STAR® Specification for Central Air Conditioners

Dear Ms. Daken:

This letter comprises the comments of the Pacific Gas and Electric Company (PG&E), San Diego Gas and Electric (SDG&E), and Southern California Edison (SCE), collectively referred to herein as the California Investor-Owned Utilities (CA IOUs), in response to the United States (U.S.) Environmental Protection Agency (EPA) proposal to sunset the ENERGY STAR Specification for Central Air Conditioners (CACs).

The CA IOUs comprise some of the largest utility companies in the nation, serving over 32 million customers in the Western U.S. We are committed to helping customers reduce energy costs and consumption while striving to meet their evolving needs and expectations. Therefore, we advocate for standards that accurately reflect the climate and conditions of our respective service areas.

We support the EPA's proposal to sunset the ENERGY STAR specification for central air conditioners (CAC), as detailed in the EPA's cover letter from April 16, 2024.¹ We previously supported the EPA's proposed sunset timing of December 30, 2024, and appreciate the agency's consideration of all stakeholder comments.² While some stakeholders requested to postpone the sunset date of the specification to February 1, 2026, we advocate for the original date of December 30, 2024. This action will help California and eight other states implement the memorandum of understanding (MOU) to achieve pollution-free residential buildings by expanding heat pump sales.³ These states are committed to ensuring that heat pumps make up at least 65% of residential-scale heating, air conditioning, and

¹ Abigail Daken, United States Environmental Protection Agency, and ICF, "Proposal to Delay the Sunset of the ENERGY STAR Central Air Conditioner Specification," *United States Environmental Protection Agency*, April 16, 2024,

<https://www.energystar.gov/sites/default/files/2024-04/ENERGY%20STAR%20Central%20Air%20Conditioner%20Sunset%20Cover%20Letter.pdf>.

² CA IOUs, "ENERGY STAR® Version 4.1 Specification for Furnaces and ENERGY STAR Version 6.1 Specification for CAC and Heat Pump Equipment," June 22, 2023,

https://www.energystar.gov/sites/default/files/asset/document/Energy%20Solutions%20Comments_1.pdf

³ Allison MacMunn, "Nine States Pledge Joint Action to Accelerate Transition to Clean Buildings," *Sunstone Strategies*, 2023, <https://www.nescaum.org/documents/2.7.24-nescaum-mou-press-release.pdf>.

water heater shipments by 2030 and 90% by 2040. The MOU aligns with the HVAC and water heating industry's pledge to assist in installing six million heat pumps by 2030.⁴

We appreciate the opportunity to provide comments about this sunset proposal and thank EPA for the opportunity to be involved in this process.

Sincerely,



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Pacific Gas and Electric Company



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⁴ Abigail Daken, United States Environmental Protection Agency, and ICF, "Proposal to Delay the Sunset of the ENERGY STAR Central Air Conditioner Specification," *United States Environmental Protection Agency*, April 16, 2024, <https://www.energystar.gov/sites/default/files/2024-04/ENERGY%20STAR%20Central%20Air%20Conditioner%20Sunset%20Cover%20Letter.pdf>.