

May 16, 2024
Via Electronic Mail



Abigail Daken
U.S. Environmental Protection Agency
Office of Air and Radiation
Washington, D.C. 20460

Re: Energy Star Sunset of Central Air Conditioners

Dear Ms. Daken,

The Northwest Energy Efficiency Alliance (NEEA) submits the following comments in response to the Environmental Protection Agency's (EPA's) proposal to sunset the ENERGY STAR specification for Central Air Conditioners.

NEEA is a non-profit organization working to encourage the development and adoption of energy-efficient products, practices, and services. Funded by regional utilities, NEEA is a collaboration of 140 utilities and efficiency organizations working together to advance energy efficiency in the Northwest on behalf of more than 13 million consumers. This unique partnership has helped make the Northwest region a national leader in energy efficiency.

We appreciate EPA's commitment to the public process and are appreciative of the opportunity to comment on this proposal. NEEA supports EPA's decision to sunset the ENERGY STAR specification for Central Air Conditioners. This decision aligns with the on-going trend among consumers to opt for heat pumps over traditional air conditioners. ENERGY STAR is wise to focusing their attention on efficient heat pumps, since they help consumers significantly reduce their energy usage throughout the year, resulting in lower utility bills and reduced environmental impact.

NEEA is confident that IRA initiatives will account for the up-front cost difference between central heat pumps and central air conditioners and propel the adoption of heat pumps. As a result, it will become increasingly important for ENERGY STAR to play a role in leading the market towards high-performance and highly efficient heat pumps. By sunseting the ENERGY STAR Central Air Conditioning specification and promoting efficient heat pumps, ENERGY STAR can drive innovation and improve energy efficiency of increasingly important heat pump systems.

We appreciate the opportunity to comment and are supportive of EPA's proposal.

Sincerely,

A handwritten signature in black ink, appearing to read 'NDunbar', with a stylized flourish extending to the right.

Nicole Dunbar
Senior Codes and Standards Engineer
NORTHWEST ENERGY EFFICIENCY ALLIANCE
700 NE Multnomah Street, Suite 1300, Portland, Oregon 97232
503.688.5400
ndunbar@neea.org