

May 16, 2024

Ann Bailey, Director
ENERGY STAR Labeling Branch
U.S. Environmental Protection Agency (EPA)
1201 Constitution Ave NW
Washington, DC 20004
Submitted via email to HVAC@energystar.gov

Re: Sunset of ENERGY STAR Label for Central Air Conditioners

Dear Director Bailey,

Thank you for the opportunity to comment on the sunset of the ENERGY STAR label for central air conditioners. The undersigned organizations — experts and advocates in building efficiency, electrification, and health — wholeheartedly support the ENERGY STAR decision and applaud EPA for continuing to identify the most efficient appliances available to consumers. We urge EPA to finalize the decision expeditiously.

ENERGY STAR has long guided consumers, businesses, and industry toward products that reduce energy consumption, improve energy security, and reduce pollution. It is also a voluntary program: even after central air conditioners no longer qualify for the ENERGY STAR label, consumers will still be able to purchase those products and any others available on the market. However, this certification sunset will provide consumers who *choose* to purchase best-in-class, maximally efficient appliances with the information they need to do so.

In its initial proposal to sunset the ENERGY STAR label for central air conditioners, EPA also calls out the market-transforming incentives included for heat pumps and other electric technologies in the Inflation Reduction Act. These incentives — including a \$2,000 (or greater, for ground-source heat pumps) tax credit and an income-qualified \$8,000 rebate for heat pump installations — will make efficient, electric appliances more accessible than ever before. As such, ENERGY STAR is right to evolve its portfolio of certified products and remain at the vanguard of appliance efficiency.

Thank you for considering these comments. We look forward to continuing to work with ENERGY STAR to realize the efficient, electrified future that our health and climate goals demand.

Sincerely,

Sierra Club
Dandelion Energy
Rewiring America

NRDC (Natural Resources Defense Council)
Earthjustice
ZeroCarbonMA
RMI