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May 16, 2024

Ms. Abigail Daken
ENERGY STAR® HVAC Program
U.S. Environmental Protection Agency
Submitted via e-mail: HVAC@energystar.gov

RE: ENERGY STAR® Central Air Conditioners Sunset Proposal

Dear Ms. Daken:

Rheem Manufacturing Company (“Rheem”) appreciates the opportunity to submit the following comments regarding the ENERGY STAR Central Air Conditioners Sunset Proposal (“Proposal.”)

Rheem is an industry leader for total heating, cooling, and water heating solutions and one of the few global brands with product offerings covering residential and commercial heating, cooling, conventional and hybrid storage water heaters, tankless water heaters, solar water heating systems, pool and spa heaters, commercial boilers, residential hydronic and geothermal systems, indoor air quality accessories, and replacement parts for all categories. Rheem, headquartered in Atlanta, Georgia, manufactures in Fort Smith, Arkansas; Montgomery, Alabama; Scottsboro, Alabama; Waterbury, Connecticut; and Oxnard, California, and operates distribution facilities throughout the US, Canada, and many other countries around the world.

Rheem reiterates prior comments that the proposal to sunset central air conditioners (CAC) from the ENERGY STAR program prematurely removes equipment that can provide significant energy savings, as CAC equipment continue to be both necessary and affordable to consumers, especially in emergency replacement applications. CAC remain a necessary form of life-saving air conditioning for consumers, especially where size or cost constraints restrict consumer access to alternatives.

Rheem shares the Environmental Protection Agency’s (EPA) focus on advancing decarbonization and energy savings and believes the ENERGY STAR program will maximize efficiency gains by maintaining visibility of all efficient products to consumers in a technology neutral manner. Rheem acknowledges that the role of CAC will diminish in favor of heat pumps in the coming years, and that the discontinuation of ENERGY STAR certification for CAC is reasonable once the market for heat pumps reaches suitable maturity, but the industry is not yet at that point, nor is it expected to be by early 2026. There is still a need for increased training for installers of heat pumps as well as consumer awareness of the capabilities and heat pump technology, which in turn will increase demand and supply chain robustness.

Rheem continues to support a national, performance-based efficiency program that recognizes accessible energy-saving products and provides visibility of such to consumers, as originally intended by



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the ENERGY STAR program. To that end, we respectfully request that this feedback be considered and the Proposal withdrawn accordingly.

Rheem appreciates the opportunity to provide comments and looks forward to continued collaboration.

Sincerely,

A handwritten signature in black ink that reads "Allison J. Skidd".

Allison J. Skidd
Director, Global Regulatory Affairs – Air
Rheem Manufacturing Company

CC: Karen Meyers

