

ENERGY STAR® Most Efficient 2025 Stakeholder Comments & Responses

Topic	Comment Summary	EPA Responses
Ducted and Ductless Air Source Heat Pumps (ASHPs)		
CEE Alignment	<p>Several commenters do not support the EPA aligning ESME 2025 ASHP requirements with the CEE IRA 25C tax credit requirements. Some of these commenters suggested that it is not clear that ESME 2025 should align, given that ESME is meant to recognize only the most efficient ASHPs and that the proposed CEE tax credit tiers are too low for this. Additionally, they also noted that alignment with CEE is not a typical goal of ESME, and that state rebates are connected to ENERGY STAR while tax credit levels are based on the highest non-advanced CEE tier. These commenters also claimed that without alignment, all ESME ASHPs will already be tax credit eligible. Lastly, they noted that the specification revision timelines for ESME and CEE are misaligned – ESME is revised annually while CEE is revised every three years. The other commenters asked that the EPA maintain ESME 2024 levels for 2025. They shared that there has been no decline in market share and that manufacturers need at least two heating/cooling seasons before new criteria are set in order to have sufficient time to redesign and market their equipment. They consider new criteria starting on January 1, 2025, to be too soon since the last ESME changes, and does not provide enough notice to manufacturers and efficiency programs. A few commenters suggested aligning the ENERGY STAR Central Heat Pump specification, not ESME, with the tax credit level in Version 7.0, while several requested that the EPA align ESME with the CEE advanced tier, not the tax credit tier. These commenters asked for alignment in 2026 rather than in 2025. Two of these requested that EER2 criteria not be reduced in this circumstance to avoid additional testing and certification burdens.</p> <p>Alternatively, several commenters noted their support for the EPA aligning ESME 2025 with the CEE tax credit levels. They believe alignment would reduce market confusion for IRA rebates and tax credits, improve messaging, and ease tax credit adoption. Two of these commenters only requested cold climate alignment in 2026, except for lowering EER2. One of these commenters cautioned the EPA to consider the high number of qualifying products that would result from lowering efficiency metrics, but still supported alignment.</p>	<p>The EPA acknowledges that the proposed ASHP criteria for ENERGY STAR Most Efficient 2025 represent a decrease in stringency compared to the recognition criteria in prior years. In taking this step, the Agency seeks to accommodate an overriding consumer interest resulting from the special circumstances associated with the 25C tax credits. The EPA shares the concerns of many that heat pump adoption and access to the IRA incentives are being hampered by confusion about what is eligible, as demonstrated by taxpayers claiming credits on less than 10% of heat pump purchases in 2023. To the extent that ENERGY STAR is widely recognized and relied on as a trusted resource, alignment with ENERGY STAR Most Efficient will simplify the purchase process for both contractors and consumers by providing a comprehensive, dedicated list of eligible configurations and an easy way to characterize them. That said, the Agency feels that achieving a 70% capacity ratio at 5F/47F is a fundamental criterion for delivering cold climate performance and important to ensuring consumer acceptance of these products in colder regions. With respect to the suggestion that the EPA, instead, align ENERGY STAR for ASHPs with the CEE tax credit levels, the Agency notes that an increase in stringency for the ENERGY STAR specification is premature given the last revision was effective in 2023 and that such a revision would require at least nine months before becoming effective.</p>

Installation Benefits	Several commenters requested that the EPA remove the installation benefits requirement for the ESME 2025 criteria. Two of these commenters alternatively suggested requiring installation benefits for both ducted and ductless units, in order to create a level playing field for all split systems.	The EPA has removed the installation benefits requirement for EMSE 2025 for all heat pump types.
CVP	Several commenters requested that the EPA permit the use of either the ENERGY STAR CVP test or the CVP test in AHRI 210/240.	The EPA is proposing to allow for the use of a DOE CVP, adopted for regulatory purposes, as an alternative procedure to the ENERGY STAR CVP. Although the commenters requested the Agency accept the AHRI 210/240 CVP, the DOE proposed a federal CVP on January 24, 2023, which differs from the procedure outlined by AHRI. Given that it will be industry standard to adopt the DOE procedure, once finalized, the EPA considers the DOE CVP as an appropriate alternative to the current CVP defined by the ENERGY STAR program. The EPA also believes this change will minimize testing burden for industry, as CEE will accept both the DOE and ENERGY STAR CVPs in 2025 and require the DOE CVP starting January 1, 2026, for determining ASHP tax credit eligibility. Since a unit must meet ENERGY STAR to be Most Efficient, this change is also applicable to Most Efficient.
2 or More Capacity Requirement	One commenter requested that the EPA reinstate the “two or more capacity levels” criterion for Most Efficient products as it optimizes energy savings, while another supported its removal.	The EPA has chosen to remove the two or more capacity levels criteria as part of our effort to align more closely with the CEE tax credit levels. We we will look to re-instate it in the future as requirements for ESME and tax credits evolve.