



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
AIR AND RADIATION

October 31, 2024

Dear ENERGY STAR® Partners and other Stakeholders:

The U.S. Environmental Protection Agency (EPA) is pleased to share the updated proposed [ENERGY STAR Most Efficient 2025 recognition criteria for Air Source Heat Pumps](#). In concert with this release, the EPA also shares a proposed amendment to the [ENERGY STAR Air Source Heat Pump Specification](#). Taken together, these proposals include marginal changes, better aligning ENERGY STAR Most Efficient 2025 with tax credit eligibility criteria, such that the widely recognized ENERGY STAR brand can more effectively be leveraged to communicate about qualifying models. To the extent you have any final feedback on this proposal and update, please submit comments to [HVAC@energystar.gov](mailto:HVAC@energystar.gov) by November 14, 2024.

**2025 ASHP Proposed Recognition Criteria**

Feedback received on the proposal to better align with the Consortium for Energy Efficient (CEE) levels associated with the 25C tax credits was mixed. While the EPA appreciates the different perspectives on its approach to ENERGY STAR Most Efficient criteria, ultimately the adjustments reflected in the updated proposal will make it easier for consumers to identify tax credit eligible options. The EPA was able to address requests to remove the installation benefits requirement. While the EPA appreciates the request to allow for use of the AHRI Certified Verification Procedure (CVP) 210/240 test, the proposal refers to the use of a DOE CVP when available, as an option, instead.

Summaries and responses to the comments can be found in the [2025 Most Efficient ASHP comment response matrix](#).

The EPA’s proposal for 2025 Most Efficient recognition includes minimal adjustments to efficiency levels for cold climate and non-cold climate units as follows:

Product type	SEER2	EER2	HSPF2
Split system HP (Ducted & Ductless)	16.0	11.0	8.0
Single-package HP	15.2	10.0	7.2
Cold Climate Split HP (Ducted & Ductless)	16.0	9.8	8.5
Cold Climate Packaged HP	15.2	10.0	8.1

This proposal retains the 1.75 COP at 5F and 70% heating capacity at 5F compared to 47F requirements for cold climate heat pumps. It also adds a low ambient performance backstop of 1.75 COP at 5F and a 45% heating capacity requirement at 5F compared to 47F for non-cold climate heat pumps.

**Proposed Amendment to Version 6.2 Specification**

In addition to meeting the ENERGY STAR Most Efficient 2025 recognition criteria, ASHP products must be ENERGY STAR certified by an EPA-recognized certification body. In some cases, the EER2 required for the Most Efficient 2025 levels is lower than that required for ENERGY STAR Version 6.1. Therefore, the EPA proposes the following changes in

the Version 6.2 amendment:

- EER2 requirement lowered to 11.0 for split systems and 10.0 for single package systems to accommodate variable speed units which have excellent seasonal performance and, on average, do not run at full capacity during peak cooling.
- The option to use the DOE CVP, when available, instead of the ENERGY STAR CVP, for verifying low ambient performance of cold climate heat pumps.
- Reporting requirement for COP at 5F, Heating Capacity at 5F/47F, and CVP verification, where available, to facilitate identification of models eligible for ENERGY STAR Most Efficient.

This amendment will not impact any currently certified models. For more details on these changes, please see the [Version 6.2 Specification](#).

The EPA will provide additional information regarding the roll out of ENERGY STAR Most Efficient 2025 recognition with the finalization of these criteria.

This document and the ESME ASHP 2025 criteria document can be found [here](#). It can also be found along with the ENERGY STAR ASHP Version 6.2 proposal [here](#). Please provide any final feedback or concerns on either publication to [HVAC@energystar.gov](mailto:HVAC@energystar.gov) no later than **November 14, 2024**. Unless the commenter asks otherwise, all comments will be posted to the ENERGY STAR Most Efficient criteria development page and/or the ASHP specification development page, as relevant. The EPA plans to finalize these documents in November/December 2024.

Thank you for your support of the ENERGY STAR program.

Sincerely,

A handwritten signature in black ink, appearing to read "Ann Bailey". The signature is fluid and cursive, with the first letter of the first name being a large, looped capital "A".

Ann Bailey, Director  
ENERGY STAR Product Labeling

Enclosures:

[ENERGY STAR Version 6.2 Air Source Heat Pump Specification](#)  
[ENERGY STAR Most Efficient 2025 recognition criteria for Air Source Heat Pumps](#)  
[2025 Most Efficient Air Source Heat Pumps Comment Response Matrix](#)