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February 4, 2024

Holly Tapani  
ENERGY STAR® HVAC Program  
U.S. Environmental Protection Agency  
Submitted via e-mail: [HVAC@energystar.gov](mailto:HVAC@energystar.gov)

**RE: Draft 1 Version 6.0 and Version 7.0 ENERGY STAR Specifications for Room Air Conditioners, Supplemental Feedback**

Dear Ms. Tapani:

Rheem Manufacturing Company (“Rheem”) appreciates the opportunity to submit additional comments regarding the Draft 1 Version 6.0 and Version 7.0 specifications for room air conditioners.

Our comment letter from December 30, 2024, contained our consolidated feedback on draft version 6.0. The supplemental points below pertain to draft version 7.0.

- The AC criteria should be no higher than 5% above 2026 federal minimum efficiency.  
The minimum energy efficiency requirements for room air conditioners (RAC) is set to increase on May 26, 2026 by roughly 47% above the current standard. This precedent-setting increase will drive redesign of most models on the market for this equipment class, both reversing and non-reversing. We appreciate the intention to provide advantage to heat pumps over AC and support its roots in overall decarbonization. However, the cooling efficiency hike is so drastic in the federal rule that adding 10% for AC criteria risks eliminating most models from the program at a time when RHP are still a very small portion of the market. The inventory in the market at the time of the specification change will be that of the prior federal standard and will take an additional cooling season (at least) to deplete. We recommend setting the initial criteria for both AC and HP to no greater than 5% above the federal minimum and then consider additional increases once there is model availability data in the directory for 2026.
- Label recommendations should be optional and defer to manufacturer discretion.  
We support providing useful information to the consumer to aid in product selection and energy efficiency awareness. We also find that the need for low- or high-ambient performance varies not only by climate zone, but on existing infrastructure, building



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load, availability of supplemental cooling and heating, and space considerations. For these reasons, and also considering the need to avoid a proliferation of labels for a relatively small appliance that is visible in a consumer's home, we do not support mandatory label declarations of climate performance. Such market-targeting information should be left to the discretion of the manufacturer. **If staff would like to include label suggestions in the specification, such guidelines should be offered as optional only.** It is our observation that it is uncommon to have multiple RHP units on a retailer shelf for consumers to compare.

If label recommendations are offered by ENERGY STAR, we would suggest eliminating the climate map, which is already apparent information to the consumer and redundant to the performance ratings. We also suggest reducing categories to just two, such as "warm climate" and "cold climate," instead of four.

Reiterating past comments, we encourage EPA to quickly publish Version 6.0 criteria so that RHP might qualify for incentives under the High-Efficiency Electric Home Rebate Program in 2025. We appreciate the opportunity to provide these comments and look 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, Lionel Lopez

