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Air Conditioning Contractors of America

1520 Belle View Blvd. #5220
Alexandria, VA 22307

June 22, 2023

Environmental Protection Agency
Attn: HVAC Program
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: Proposed Changes to ENERGY STAR Program for Residential Heating and Cooling Equipment

Dear HVAC Program Team,

I am writing on behalf of the Air Conditioning Contractors of America (ACCA), the nation's leading association for heating, ventilation, air conditioning, and refrigeration (HVAC-R) contractors. Our over 3,000 member companies are recognized as industry leaders and are responsible for \$88 billion in annual sales. They are responsible for designing, installing, and maintaining HVAC-R systems that heat and cool homes, protect our food supply, ensure the possibility of modern medicine, and enable data centers to operate. I write to express our strong opposition to the proposed changes to the ENERGY STAR program for residential heating and cooling equipment, as outlined in your recent communication. While we acknowledge the importance of energy efficiency and environmental sustainability, we believe phasing out the ENERGY STAR certification for residential furnaces and central air conditioners (CACs) is a misguided decision that will negatively affect consumers and the HVAC-R industry.

First, we believe that the proposed focus on electric heat pumps neglects the diverse needs of consumers. While heat pumps may be a viable option in specific regions or climates, they are not suitable for all households, especially those in colder climates where they may not provide adequate heating capacity, for those with larger homes, or for those in areas with different power infrastructure capabilities. Moreover, homes in very cold climates will require large capacity units to provide sufficient heating, and in the summer, they will be grossly oversized. This will require additional equipment to provide supplemental dehumidification. This added expense will not be suitable for all households, and the extent of funds included in the Inflation Reduction Act (IRA) will not be sufficient to provide an electric heat pump in addition to supplemental dehumidification equipment. We must respect consumer choice and consider each household's specific needs and circumstances. By phasing out the ENERGY STAR label for residential furnaces, EPA effectively limits consumer choice by pushing consumers into adopting a specific technology without considering their individual needs and circumstances.

Furthermore, the proposed changes fail to acknowledge the significant technological advancements in the design and efficiency of gas furnaces and CACs. The HVAC industry has invested substantial resources in research and development to improve these systems' energy efficiency and environmental performance. Gas furnaces and modern CACs exhibit exceptional efficiency levels and present significantly reduced emissions compared to previous models. This is especially true when they are installed and maintained properly by a qualified HVAC-R professional. By removing the ENERGY STAR certification, you are undermining the progress made by manufacturers and discouraging further innovation in this sector.

Additionally, the HVAC-R industry has invested heavily in training and certifying technicians and contractors to install and service gas furnaces and CACs. This includes ACCA's Quality Assured Accreditation program. Phasing out these technologies without providing adequate support or alternative training programs will negatively affect the HVAC-R industry.



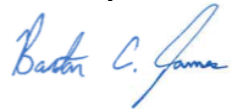
As you may know, the IRA has extended and expanded the 25C tax credit for homeowners, covering CAC and central furnaces, in addition to heat pumps, based on higher efficiency levels. These credits start January 1, 2023, through 2032. It would be short-sighted for EPA to sunset the CAC and Furnace ENERGY STAR certifications after 2024. The transition to heat pumps will not take place overnight and is fraught with other challenges such as upgrading electrical supplies in existing homes.

We urge you to reconsider this proposal. We recommend maintaining the ENERGY STAR certification for residential furnaces and CACs, while simultaneously encouraging the development of more efficient and environmentally friendly options across all technologies.

We appreciate the opportunity to provide our perspective on this matter and would welcome the opportunity to engage in further discussions to explore alternative solutions that align with the goals of the HVAC-R industry and the ENERGY STAR program. Please consider our concerns and the potential unintended consequences that may arise from these proposed changes.

Thank you for your attention to this critical issue. We look forward to your response.

Sincerely,



Barton James
President & CEO
Air Conditioning Contractors of America