

Appliance Standards Awareness Project
American Council for an Energy-Efficient Economy

June 22, 2023

Ann Bailey, Director
ENERGY STAR Product Labeling
U.S. Environmental Protection Agency
William Jefferson Clinton Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460

RE: ENERGY STAR Residential Furnaces and Central Air Conditioners Sunset Proposal

Dear Ms. Bailey,

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP) and the American Council for an Energy-Efficient Economy (ACEEE) on EPA's proposal to sunset the certification pathway to the ENERGY STAR label for residential furnaces and central air conditioners (CACs). We appreciate the opportunity to comment.

We support EPA's sunset proposal. In light of the imperative to address climate change and the availability of efficient electric heat pumps, furnaces and CACs can no longer be considered climate friendly or green alternatives to heat or cool homes.

To achieve President Biden's objective of a net-zero economy by 2050, the U.S. will need to drastically reduce fossil fuel use in buildings by transitioning gas and oil appliances and equipment to efficient electric alternatives. Sunsetting the ENERGY STAR certification pathway for both residential furnaces and CACs would support this transition. Since furnaces last for more than 20 years on average,¹ reaching a net-zero economy by 2050 will require rapidly shifting the market to electric heat pumps. Furthermore, since heat pumps provide the same cooling service as CACs while also providing efficient electric heating, replacing CACs with heat pumps represents an important electrification opportunity.

In addition, as EPA noted in its letter to stakeholders,² the passage of the Inflation Reduction Act (IRA) provides an unprecedented opportunity for this transition to efficient electric appliances and equipment. In particular, the tax credits and forthcoming rebates for heat pumps in the IRA will significantly reduce the upfront cost for many consumers.

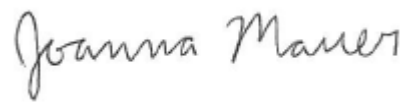
We also believe that EPA's proposed timing—sunsetting the ENERGY STAR Version 4.1 Specification for Furnaces and removing CACs from the ENERGY STAR V6.1 Specification for CAC and Heat Pump Equipment effective December 30, 2024, with no new certifications accepted after December 30, 2023—is appropriate and provides sufficient time for the market to transition.

Thank you for considering these comments.


¹ <https://www.regulations.gov/document/EERE-2014-BT-STD-0031-0320>. p. 8-29.

² <https://www.energystar.gov/sites/default/files/asset/document/HVAC%20Sunset%20Letter.pdf>.

Sincerely,

Handwritten signature of Joanna Mauer in black ink.

Joanna Mauer
Deputy Director
Appliance Standards Awareness Project

Handwritten signature of Steven M. Nadel in black ink.

Steve Nadel
Executive Director
American Council for an Energy-Efficient
Economy