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February 23, 2021

Ms. Abigail Daken
ENERGY STAR for HVAC
U.S. Environmental Protection Agency
Office of Air and Radiation
12000 Pennsylvania Avenue, NW
Washington, DC 20460

Subject: Limited Topic Proposal on Final Draft Version 6.0 ENERGY STAR® Central Air Conditioner and Heat Pump Specification

Dear Ms. Daken:

This letter comprises the comments of the Pacific Gas and Electric Company (PG&E), San Diego Gas and Electric (SDG&E), and Southern California Edison (SCE), in response to the United States (U.S.) Environmental Protection Agency (EPA) Limited Topic Proposal (LTP) on the Final Draft Version 6.0 ENERGY STAR® Central Air Conditioner and Heat Pump (CAC/HP) Specification (Version 6.0 Specification).

The signatories of this letter, collectively referred to herein as the California Investor-Owned Utilities (CA IOUs), represent some of the largest utility companies in the Western U.S., serving over 32 million customers. As energy companies, we understand the potential of appliance efficiency standards to cut costs and reduce consumption while maintaining or increasing consumer utility of products. We have a responsibility to our customers to advocate for standards that accurately reflect the climate and conditions of our respective service areas, so as to maximize these positive effects.

We appreciate the opportunity to respond to this LTP and commend EPA for working diligently to finalize the Version 6.0 Specification. In past comments, the CA IOUs have supported EPA's efforts to develop a representative specification for CAC/HPs, including the introduction of a cold climate verification procedure (CVP) for these products.^{1, 2} The Version 6.0 Specification, as well as the CVP, represent a significant step forward for ENERGY STAR's CAC/HP Program and will lay a strong foundation for future specifications. We acknowledge that the installation criteria originally proposed for the Version 6.0 Specification were targeting equipment with three or more capacities, or equipment with fully variable capacity. We also acknowledge that these installation criteria may not be commonly available for many simpler single-stage and two-stage systems. Given the decision to expand the scope of the Version 6.0 Specification to these simpler single-stage or two-stage systems, we support the LTP in limiting the installation criteria to equipment with three or more capacities, or equipment with fully variable capacity.

¹ CA IOU comments on Draft 2 Version 6.0 Specification and Final Draft CVP located [here](#).

² CA IOU comments on Final Draft Version 6.0 Specification and Final Draft CVP located [here](#).

In conclusion, we would like to reiterate our support for EPA's LTP on the Final Draft Version 6.0 ENERGY STAR CAC/HP Specification. We thank EPA for the opportunity to be involved in this process.

Sincerely,



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Pacific Gas and Electric Company



Karen Klepack
Senior Manager, Building Electrification and
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