

Ann Bailey, Director
ENERGY STAR Labeling Branch
U.S. Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20460

Re: EPA proposal to phase out ENERGY STAR certification for residential gas furnaces and central air conditioners

Dear Ms. Bailey:

On behalf of Consumer Energy Alliance (CEA), I write today regarding the EPA's recent notice to ENERGY STAR residential heating and cooling equipment partners outlining a proposal to sunset the labeling and promotion of residential gas furnaces and central air conditioners (CAC), published on May 18, 2023. CEA strongly opposes the sunset provision.

Founded in 2006, CEA is a nonpartisan, nonprofit organization advocating for balanced energy and environmental policies and responsible access to resources. CEA is the nation's leading consumer energy and environmental advocate – ensuring families, farmers, and local businesses have access to sustainably produced, affordable, reliable and environmentally responsible energy. We support a rational, all-of-the-above energy policy that provides the options to utilize all our domestic natural resources – both traditional and renewable – while ensuring robust environmental protections are in place.

Our more than 550,000 individual members represent a cross-section of the economy, all of whom have been impacted by rising inflation often triggered by ever-increasing energy costs. Families throughout country have been suffering from high energy bills for the past several years, and many have been forced to choose between paying their energy bills or placing food on the table. Now, as record high temperatures make their way across the United States, particularly in the South and Gulf Coast, EPA's proposal would lead to confusion and unnecessarily restrict a consumer's ability to purchase the most affordable and efficient appliance for their household.

In addition, the proposed changes to the ENERGY STAR program will cause confusion for consumers who attempt to fully understand the energy efficiency qualities of air conditioning systems and gas furnaces, which have historically been highlighted through the ENERGY STAR program.

More concerning than the likely confusion among consumers, this proposal could price Americans out of being able to keep themselves cool and comfortable in the summer heat and warm when cold winter weather arrives. Many rebate programs offered by utilities because of state incentives are provided only when appliances meet ENERGY STAR requirements. By arbitrarily singling out appliances based on fuel source, as opposed to promoting energy efficiency, consumers would no longer have access to appliances that are more efficient and meet their individual needs. Furthermore, as state and local building codes have evolved to favor ENERGY STAR standards, removing appliances solely based on fuel type will force consumers to choose from a reduced selection of appliances, but will almost certainly also force consumers to pay for electrical upgrades as a result of this lack of consumer choice.

The EPA's draconian tactics that propose to phase out these widely-available, efficient, and environmentally sustainable appliance options do little more than harm low- and fixed-income Americans. By seeking to phase out residential gas-powered furnaces, the EPA is willfully ignoring the fact that natural gas is the cleanest-burning and most affordable energy source for most Americans.

As such, CEA respectfully opposes the proposal to sunset the ENERGY STAR Version 4.1 Specification for Furnaces and removing central air conditioners. We also request that more time be allowed for all stakeholders –in particular families whose options will be curtailed by the proposal – to have meaningful access to publicly participate in this process.

Sincerely,



David Holt
President