



**SUBMITTED VIA EMAIL to HVAC@energystar.gov**

June 22, 2023

Ann Bailey  
Director, EPA Energy Star Product Labeling  
United States Environmental Protection Agency  
Washington, D.C.

Subject: Proposed sunset of the certification pathway to the ENERGY STAR label for residential furnaces and central air conditioners (CACs).

Dear Ms. Bailey:

Daikin Comfort Technologies North America, Inc. (“Daikin”) - (formerly Goodman Manufacturing Company, L.P.) - submits the following comments in response to the U.S. Environmental Protection Agency’s (“EPA”) proposal to sunset the ENERGY STAR Version 4.1 Specification for Furnaces and to remove central air conditioners from the ENERGY STAR V6.1 Specification for CAC and Heat Pump Equipment.

Daikin is a member of Daikin Group, the largest heating, ventilation, and air conditioning (“HVAC”) manufacturer in the world. Daikin is headquartered in Waller, Texas, and employs thousands of workers across the United States. The company manufactures residential and light commercial heating and cooling equipment, and its products are sold and installed by contractors in every American state and territory, as well as in Canada.

As a manufacturer of high efficiency inverter heat pumps, Daikin supports EPA’s decision to focus the ENERGY STAR program on heat pump products that save energy and benefit consumers. Inverter high efficiency heat pumps reduce energy consumption, and in particular mitigate the use of inefficient electric resistance heat, and can be applied to serve consumers in all climates. The sunset of the CAC and Furnace programs is a positive step forward for ENERGY STAR and further solidifies EPA’s position as a leader in improving the market offering to consumers and stimulating programs to help the U.S. meet its climate objectives.

In addition to changing the focus of ENERGY STAR from CAC and Furnaces to heat pumps, Daikin believes existing requirements for heat pumps could be strengthened further to guide consumers to the most refrigerant-responsible equipment available, aligning with EPA’s Office of Air and Radiation (OAR) climate change policies. By modifying existing requirements, EPA could help to reduce the total amount of refrigerant required in heat pumps, which is better for consumers and reduces the associated carbon emissions from HVAC products. To accomplish this, EPA should modify the v6.1 CACHP requirements to increase the proportion of products in the marketplace with high seasonal efficiencies by eliminating requirements for EER2. The EER2 metric does not accurately reflect the applied efficiency of variable speed heat pumps. Higher EER2 requirements promote and reward an increase in refrigerant use per system installed.

Heat pump adoption has the added benefit of decarbonizing the national heating mix in many climates. Dual fuel systems can be utilized in applications where heat pumps applied in replacement applications may not satisfy the full heating load. These products can help to increase consumer confidence in heat pumps while providing comfort in colder climates. EPA should consider these products as part of the ENERGY STAR specification for heat pumps so that only high efficiency furnaces are applied in these applications.

The environmental benefits of variable speed inverter heat pumps, low refrigerant charge, electrification and decarbonization are core to Daikin's philosophy of advocating for heat pump proliferation and we look forward to working with EPA to advance these goals.

Daikin appreciates the opportunity to provide these comments. We support EPA's goal of promoting heat pumps and welcome new specifications which the Agency may advance to support that goal. If you have any questions regarding this submission, please do not hesitate to contact me by phone or email.

Sincerely,

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cc: Nathan Walker