

Submitted via e-mail

Ann Bailey, Director
ENERGY STAR Labeling Branch
US EPA

June 22, 2023

Dear Ms. Bailey:

The Energy Efficiency Alliance of New Jersey (“EEA-NJ”) and the Keystone Energy Efficiency Alliance (KEEA) are pleased to submit these comments to the EPA regarding the proposed sunset of the Energy Star certification for furnaces and central air conditioning.

EEA-NJ and KEEA are trade associations for the energy efficiency industry in New Jersey and Pennsylvania, respectively. The two organizations have 70 business members who provide energy efficiency products and services in support of an industry that accounts for more than 30,000 New Jersey jobs and over 65,000 Pennsylvania jobs. Our mission is to champion efficiency as the foundation of a clean, just, and resilient energy economy.

EEA-NJ and KEEA strongly support building decarbonization efforts that pair efficiency measures with electrification. We are working to educate decision makers about the benefits of highly efficient, variable capacity heat pumps. We encourage the use of tools, like Energy Star, to motivate customers’ choice of these systems and thus support the proposed sunset.

We suggest a few cautions regarding the removal of Energy Star eligibility from central air conditioners and furnaces:

1. The proposed sunset will require changes to some weatherization assistance and utility programs, many of which operate on prescribed multi-year phases. For example, New Jersey’s utility energy efficiency programs operate on a 3-year cycle; Pennsylvania’s on a 5-year cycle. These programs often use “Energy Star” as a requirement when specifying equipment. Even small changes that happen mid-phase can create significant, rippling changes for both the businesses that implement the programs and for the utilities themselves. The runway for the sunset may need to be elongated by one more year in order to allow state and utility programs to effectively shift their requirements and marketing.
2. In listening sessions with our members and other industry professionals, there was a concern that removing the Energy Star specification from furnaces and central air conditioning could lead to lower-efficiency equipment being installed by customers who do not choose a heat pump. In the absence of the trusted Energy Star label as a guide, consumers – especially those with limited income or technical interest or knowledge – will be more likely to select equipment simply based on upfront cost, which favors less efficient equipment. EPA needs to invest in consumer and contractor education to

ensure that customers who are not yet ready or able to choose a heat pump, especially those of modest means, are still encouraged to choose the higher-efficiency option out of the furnaces or CACs they purchase in the near term. While the Energy Guide label provides needed efficiency comparison information, it is simply not as accessible or understandable to consumers as Energy Star.

3. There is already a lack of alignment for standards in federal, state, and utility efficiency and electrification programs, which causes confusion for consumers and a more complicated compliance landscape for businesses. It will be important for any changes to the Energy Star program to dovetail with the intention and execution of the energy efficiency programs from the Inflation Reduction Act.
4. We ask that future major changes to Energy Star be disseminated to stakeholders more widely and robustly. This sunset is a major change in the program that may impact efficiency and electrification programs across the country, but most of our partners in government, nonprofits, and industry hadn't even heard about it until we brought it to their attention. We are only aware of an announcement to the Energy Star mailing list. While technical upgrades may be appropriate to share with a more limited group, this is a major change that should be more transparent for stakeholders.

Thank you for the opportunity to submit comments. We look forward to the forthcoming sunset proposals on boilers, dryers, and commercial packaged boilers. To elevate efficient heating and cooling, oil boilers must be strongly discouraged.

Sincerely,

Rachel Goodgal
Government Affairs Manager
Energy Efficiency Alliance of New Jersey & Keystone Energy Efficiency Alliance