



June 22, 2023

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

Topic: ENERGY STAR® Version 4.1 Specification for Furnaces and ENERGY STAR Version 6.1 Specification for CAC and Heat Pump Equipment.

Dear Ms. Bailey:

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), collectively referred to herein as the California Investor-Owned Utilities (CA IOUs), in response to the United States (U.S.) Environmental Protection Agency (EPA) proposal to sunset the ENERGY STAR® Version 4.1 Specification for Furnaces and remove central air conditioners from ENERGY STAR V6.1 Specification for Central Air Conditioner and Heat Pump Equipment.

The CA IOUs represent some of the largest utility companies, serving over 32 million customers in the Western U.S. We are committed to helping customers reduce energy costs and consumption, while striving to meet their evolving needs and expectations. Therefore, we advocate for specifications that accurately reflect the climate and conditions of our respective service areas.

We support EPA's proposal to sunset the ENERGY STAR® label for residential furnaces and central air conditioners. In light of DOE's July 2022 proposal of a 95% AFUE energy conservation standard for non-weatherized gas furnaces,¹ there is no incremental value in distinguishing between the highest efficiency furnace equipment, given that the highest efficiency level prescribed in the ENERGY STAR® Version 4.1 Specification for Furnaces is also at 95% AFUE for the U.S. North/Canada region.² In addition, we support EPA's decision to focus its efforts on specifications for heat pump products as they offer both cooling and heating utility to consumers. ENERGY STAR® certified heat pumps that satisfy the optional connected criteria set forth in the ENERGY STAR® V6.1 Specification will enable better management of peak load in both cooling and heating seasons. In addition, as part of the California Energy Commission's (CEC) 2025 energy code pre-rulemaking, Natural Resources Defense Council, Earth Justice, Rocky Mountain Institute, and Sierra Club jointly submitted an analysis that showed replacing air conditioners with heat pumps is generally feasible and cost-effective in most California climate zones.³ We encourage EPA to proceed with this proposal on the aforementioned specifications.

¹ <https://www.regulations.gov/document/EERE-2014-BT-STD-0031-0325>

² <https://www.energystar.gov/sites/default/files/Furnaces%20Version%204.1%20Program%20Requirements%200.pdf>

³ CEC Docket Number [22-BTSD-01](#); TN number [249551](#)

We appreciate the opportunity to provide comments about this sunset proposal and thank EPA for the opportunity to be involved in this process.

Sincerely,



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