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August 15, 2022

Ann Bailey
Director, ENERGY STAR
United States Environmental Protection Agency
Washington, DC 20460

Submitted via e-mail: MostEfficient@energystar.gov

Re: EPA ENERGY STAR Most Efficient 2022 and Proposed Recognition Criteria for 2023.

Lennox International Inc. (Lennox) hereby submits comments on the *United States Environmental Protection Agency (EPA) ENERGY STAR Most Efficient 2022 and Proposed Recognition Criteria for 2023* as published by the EPA on July 12, 2022.

Lennox is a leading provider of climate-control solutions for heating, air conditioning, and refrigeration markets. Lennox is a publicly-traded company that has thousands of employees, and it manufactures equipment addressed by the EPA ENERGY STAR Most Efficient program criteria.

A. General Comments.

Lennox believes the EPA ENERGY STAR program can effectively promote increased energy efficiency. This can be accomplished by maintaining a program that is not burdensome to administer combined with *reasonable* specifications for energy performance criteria that consider impacts to consumers, contractors, distributors and manufacturers.

Lennox further supports ENERGY STAR Most Efficient criteria to promote highly efficient products and manufactures industry leading products in many categories. This is exemplified by being the first to demonstrate performance meeting the DOE Cold Climate Heat Pump Challenge announced in June 2022. Lennox recommends that the ENERGY STAR Most Efficient program be used to identify and recognize the products which are the leading products in their perspective product categories and not bias the program toward specific product types. As the nation works toward decarbonization, all viable electric, gas and alternative energy sources likely have a role to meet consumer needs at reasonable cost and the Most Efficient program should be used to identify the leading efficiency products in each category and foster innovation. While heat pumps are a leading technology in efforts to decarbonize, due to diversity of U.S. climates the most effective option may not be a one size fits all solution. In colder climates the heating load of residential buildings can be several times the cooling load requiring supplemental heat to maintain building temperature. Conversely in warmer areas of the U.S. where cooling is the predominate load consumers need affordable high efficiency cooling products. ENERGY STAR should recognize the leaders in each product categories which foster further innovation and may result in highly efficient hybrid, alternative fuel, or other solutions to meet these needs. Lennox is committed to reducing emissions through the

development of highly efficient products and throughout our supply chain and recommends the ENERGY STAR Most Efficient program focus on recognizing the most efficient products in each category which allows regional programs to be tailored to the specific climate and energy needs.

B. Specific Issues regarding the Proposed Criteria.

Lennox supports the proposed ENERGY STAR Most Efficient Criteria 2023 for Central Air Conditioners and Heat Pumps which maintains the levels translated to the new DOE M1 metrics. Lennox also support the ENERGY STAR effort to simplify the criteria to allow EPA to nominate products automatically from products certified to ENERGY STAR Version 6.1, eliminating the need for an application but must do so in an efficient and verifiable manner.

In conclusion, Lennox supports the ENERGY STAR Most Efficient 2023 proposed levels for Central Air Conditioning and Heat Pump products. Lennox further recommends that the Most Efficient program be used to identify and recognize the products which are the leading products in their perspective product categories and not bias the program toward specific product types. Please feel free to contact us with any further questions regarding these comments.

Sincerely,

A handwritten signature in cursive script that reads "David Winningham".

David Winningham
Sr. Engineering Manager, Regulatory Affairs
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