

June 22, 2023

Ms. Ann Bailey, Director, ENERGY STAR Product Labeling  
United States Environmental Protection Agency  
Office of Air and Radiation  
Washington, DC 20460  
VIA EMAIL: HVAC@energystar.gov

*RE: ENERGY STAR Sunset Proposal for Residential Furnaces and Central Air Conditioners*

Dear Director Bailey:

The Northeast States for Coordinated Air Use Management (NESCAUM) appreciates the opportunity to comment on EPA's proposal to sunset the ENERGY STAR Version 4.1 Specification for Furnaces and remove central air conditioners (CACs) from the ENERGY STAR V6.1 Specification for CAC and Heat Pump Equipment. NESCAUM is an association of the air pollution control agencies of the eight Northeast states of Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island, and Vermont. Our member agencies have the primary responsibility in their states for implementing clean air programs that achieve the public health and environmental protection goals of the federal Clean Air Act and state climate laws. NESCAUM supports EPA's proposal because it will send a clear market signal that heat pumps should be considered the energy-efficient choice for home heating and cooling, in alignment with ENERGY STAR's guiding principles.<sup>1</sup>

As progress has been made in curbing emissions from power plants, vehicles, and other sources, the relative contribution to air pollution from the building sector has increased. As a result, states have identified buildings as an important sector to focus on in mitigating climate change and reducing emissions of air pollutants such as nitrogen oxides (NO<sub>x</sub>) and fine particulate matter (PM<sub>2.5</sub>).<sup>2</sup> A recent NESCAUM analysis found that residential buildings emit approximately 70,000 tons of NO<sub>x</sub> annually in the region, significantly more than power plants.<sup>3</sup> Space heating is responsible for approximately 80% of these emissions from buildings, so it is critical to transition from furnaces and other fossil fuel-fired space heating equipment to zero-emissions alternatives such as heat pumps.

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<sup>1</sup> EPA, "ENERGY STAR® Products Program Strategic Vision and Guiding Principles," May 2012, [https://www.energystar.gov/sites/default/files/asset/document/ENERGY\\_STAR\\_Strategic\\_Vision\\_and\\_Guiding\\_Principles.pdf](https://www.energystar.gov/sites/default/files/asset/document/ENERGY_STAR_Strategic_Vision_and_Guiding_Principles.pdf).

<sup>2</sup> See, e.g., Resolution of the Ozone Transport Commission on Reducing Emissions of Nitrogen Oxides from Buildings, June 14, 2023, <https://otcair.org/upload/Documents/Formal%20Actions/20230614%20OTC%20Resolution%20buildings%20signed.pdf>.

<sup>3</sup> NESCAUM, "Electrification of Residential Buildings: Draft Results of Energy and Emissions Savings Analysis," November 15, 2022, <https://www.nescaum.org/documents/emissions-benefits-of-residential-building-electrification>.

NESCAUM's Building Electrification Initiative provides technical and policy support to state air and climate offices working to reduce building-related emissions to help meet state air quality and climate goals. The goal of the Initiative is to build state capacity to address greenhouse gas (GHG) and air pollutant emissions from the building sector through convening, information-sharing, research and analysis, and policy development. States participating in the Building Electrification Initiative aim to significantly reduce or eliminate both GHG and air pollutant emissions from the building sector by 2050. Given the long lifespans of building equipment, achieving the 2050 goal will require that, to the greatest extent possible, space and water heating equipment installed after 2030 should be zero-emission technologies like heat pumps.

States are exploring a range of policy and regulatory options to reduce emissions from buildings, from net-zero energy codes and building performance standards to clean heat standards and zero-emission standards for space and water heating equipment. For example, New York State's Climate Scoping Plan includes a provision for the adoption of zero-emission standards for space and water heating equipment. The Massachusetts Commission on Clean Heat recommended development of a Clean Heat Standard that promotes electrification of the thermal sector. Maryland's legislature recently passed a law requiring implementation of a statewide building performance standard based on direct GHG emissions. These and other policies, once adopted and implemented, will send a clear signal to the market, and they can be designed with well-defined timelines to enable an equitable and affordable transition.

EPA's proposal to sunset the ENERGY STAR certification for furnaces and CACs is a valuable complement to these policies because it will shift voluntary programs, such as utility energy efficiency programs, to more aggressively incentivize and support market adoption of heat pumps by 2030. This will help to prepare the market for state policies that will spur demand for zero-emission space heating equipment, including policies that could require that, starting in 2030 or soon after, space and water heating equipment installed must have zero NOx emissions.

Furnaces and CACs will still be widely available in the market; they just will not be certified as ENERGY STAR equipment and therefore not be identified by consumers as the energy-efficient choice. As a voluntary program, ENERGY STAR is an appropriate place to lead the market shift towards high-efficiency, zero-emissions space heating and cooling.

For the above reasons, NESCAUM supports EPA's proposal to sunset the ENERGY STAR Version 4.1 Specification for Furnaces and remove CACs from the ENERGY STAR V6.1 Specification for CAC and Heat Pump Equipment.

Sincerely,



Paul J. Miller  
Executive Director

cc: NESCAUM Directors