

November 9, 2023

Ann Bailey, Director
ENERGY STAR Labeling Branch
U.S. Environmental Protection Agency (EPA)
1201 Constitution Ave NW
Washington, D.C. 20004

Re: Recommendations for the ENERGY STAR Label for Residential Furnaces

Dear Director Bailey,

EPA's ENERGY STAR program has long guided consumers, businesses, and industry toward products that reduce energy consumption. It is also voluntary, providing consumers who *choose* to purchase best-in-class, maximally efficient appliances with the information they need to do so.

The undersigned organizations — NRDC and Rewiring America — wholeheartedly support EPA's June 2023 proposal to sunset its residential furnace and central air conditioner certifications because, when it comes to residential space heating and cooling, there's no debate: heat pumps are that best-in-class choice. By exclusively granting the ENERGY STAR label to heat pumps and related electrification technologies, EPA can steer consumers towards products that lower utility bills, reduce air pollution and improve public health, deliver better and more efficient performance, and have the highest-impact climate benefits. These arguments are further detailed in a [June 2023 letter](#) in support of the sunset proposal signed by 62 organizations that represent deep expertise in building efficiency, electrification, and health.

At the same time, we recognize that the sunset proposal for residential furnaces faces political headwinds. While these headwinds may delay the sunset of ENERGY STAR's furnace certification, they must not be used as an excuse to delay action entirely — and they should not be used to delay the central air conditioner sunset at all. The ENERGY STAR furnace specification was last updated six years ago; there is no legitimate reason to further delay a much-needed update. This is especially true given DOE's [recent finalization](#) of a new national furnace standard that will increase the minimum efficiency of all new furnaces to 95% AFUE by late 2028. At that date, the *minimum efficiency requirement* for furnaces will equal the current ENERGY STAR eligibility criteria, effectively rendering the existing ENERGY STAR label meaningless. EPA must act proactively to avoid this outcome and get ahead of the coming market transformation, which is already well underway. Already, 438 furnaces are listed on ENERGY STAR's Product Finder as having an AFUE of at least 97 percent.

If sunseting the ENERGY STAR furnace certification is currently infeasible, then EPA should pursue an interim specification for increased furnace efficiency on the same timeline. We offer the

following recommendations (in order of preference) for the ENERGY STAR certification for residential gas furnaces:

1. EPA should finalize its proposal to sunset the ENERGY STAR furnace certification by December 30, 2024.
2. If the sunset is not pursued right now, EPA should publish a transparent timeline for when the sunset will occur — which should be as soon as possible. In the meantime, EPA should revise the ENERGY STAR furnace specification to a national minimum efficiency of at least 97 percent AFUE by December 30, 2024.

Thank you for considering these comments. We look forward to continuing to work with EPA and ENERGY STAR to realize the efficient, electrified future that our health and climate goals demand.

Sincerely,

Natural Resources Defense Council (NRDC) and Rewiring America