

June 22, 2023

Ann Bailey, Director
ENERGY STAR Labeling Branch
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460

Director Bailey,

On behalf of the Natural Resources Defense Council, and our more than 3 million members and online activists, I am proud to submit the following comments in support of the Environmental Protection Agency's (EPA) proposal to sunset ENERGY STAR certification for furnaces and central air conditioners (CACs).

As EPA notes in the letter accompanying the sunset proposal, heat pumps can be four times as efficient as even the most efficient gas furnace. Because heat pumps can also run in reverse to cool air, the most efficient option for consumers is to ditch gas furnaces and standalone CACs in favor of this more efficient option. EPA's proposal recognizes this important fact.

Two factors make this proposal particularly timely. First, the time for efficient electrification is now: continuing to make the electrical grid cleaner and decarbonizing buildings must happen in tandem.¹ Because furnaces and central air conditioners have long lifetimes (10-12 years or more), installing inefficient products today means they will emit extra carbon pollution for years. By helping to shift the market to heat pumps, EPA will help consumers avoid being locked into less efficient, more carbon intensive purchases. The benefits are substantial—as EPA notes in its letter, if every household in the United States were to replace a CAC with a heat pump, we would avoid 50 million metric tons of carbon pollution over ten years while also generating billions of dollars in savings for consumers in reduced utility bills.

Second, the Inflation Reduction Act contains funding to help reduce the purchase price of efficient products like heat pumps.² That means that it has never been more affordable to install one. By pushing the market in this direction, EPA is also helping consumers make the most of this important opportunity.

For all of these reasons we support EPA's proposal and look forward to forthcoming opportunities to discuss sunseting certification for fossil fuel products in the context of boilers, clothes dryers, and commercial packaged boilers.

Sincerely,



Joseph Vukovich
Staff Attorney
Natural Resources Defense Council

¹ See Courtney Lindwall, "Why We Must Electrify Everything Even Before the Grid is Fully Green," NRDC (Dec. 1, 2022), available at <https://www.nrdc.org/stories/why-we-must-electrify-everything-even-grid-fully-green>.

² Lauren Urbanek, "There's No Better Time to Consider Home Energy Upgrades," NRDC (Sept. 6, 2022), available at <https://www.nrdc.org/bio/lauren-urbanek/theres-no-better-time-consider-home-energy-upgrades>.