

June 20, 2023

Ann Bailey, Director
ENERGY STAR Labeling Branch
U.S. Environmental Protection Agency (EPA)
1201 Constitution Ave NW
Washington, DC 20004
Submitted via email to HVAC@energystar.gov

Re: Proposed Sunset of ENERGY STAR Label for Residential Furnaces and Central Air Conditioners

Director Bailey,

Thank you for the opportunity to comment on the proposed sunset of ENERGY STAR labeling for residential furnaces and central air conditioners (CACs). As CEOs and business leaders in the field of Heating, Ventilation, and Air Conditioning [HVAC] and electrified homes – manufacturers, distributors, financers, and installers – we strongly support this proposal and believe it will bring significant benefits to our industry and to the American consumer.

ENERGY STAR has a track record of helping guide customers, businesses, and industry toward products that reduce energy consumption, improve energy security, and reduce pollution. We believe the shift to greater heat pump adoption, which has already begun¹ and is incentivized through the Inflation Reduction Act,² will bring economic, health, and climate benefits to millions of Americans, while creating new, high-paying domestic jobs in manufacturing, installation, and associated supply chains.

As business leaders, we appreciate the voluntary nature of the program: manufacturers will still be able to sell, and consumers will still be able to purchase CACs and furnaces. However, this proposal will provide consumers who *choose* to purchase best-in-class, maximally efficient appliances with the information they need to find the best options in the market. And this signal from a trusted authority will spur innovation in our industry toward even greater efficiencies and lower costs.

Finally, we believe that reserving the ENERGY STAR label for heat pumps and other efficient machines will benefit consumers by reducing energy consumption needed for home comfort, and thus reducing energy bills. Delaying this necessary labeling change would result in higher average utility costs for American consumers for a longer period of time.

Thank you for considering these comments. We look forward to continuing to work with

¹ <https://www.nytimes.com/interactive/2023/02/22/climate/heat-pumps-extreme-cold.html>

² <https://www.rewiringamerica.org/app/ira-calculator/information/heat-pump-air-conditioner-heater>

ENERGY STAR to realize the efficient, electrified future that our health, economic, and climate goals demand.

Sincerely,

Vincent Romanin, CEO, Gradient

Donnel Baird, Founder & CEO, BlocPower

Arch Rao, Founder & CEO, SPAN

Andy Frank, Co-founder & President, Sealed

Paul Lambert, Founder & CEO, Quilt Systems

Vikram Aggarwal, CEO & Founder; Board Director, EnergySage

Aaron Smith, Founder & CEO, GreenSmith Builders

Daniel Myers, Founder & CEO, Flair Systems

Peter Light, CEO, Lumen Energy

Jim Conlon, Founder and President, Elysian Energy

Eric Reinhardt, Co-founder & CEO, Helio Home

Forest Frizzell, Co-founder & CEO, Shifted Energy

Sam Steyer, Co-founder & CEO, Greenwork

Jamie Skaar, Founder & CEO, Sol Solutions Today LLC

Scott Rosenberg, Co-founder, 257

Eric Fitz, Co-founder & CEO, Amply

Michael Mettler, Co-founder & CEO, Canopy

David Richardson, Co-founder, Elephant Energy

Ben Phillips, Co-founder and CEO, E-Den Homes

Lisa Altieri, Founder and CEO, BrightAction

Dave Boettcher, Founder & CEO, Abode Energy Management

McGee Young, Founder & CEO, WattCarbon

Grant Gunnison, Founder & CEO, Zero Homes

Jack Policar, Co-Founder & CEO, Carbon Free Homes

Robert Rosenfield, Founder, Gridly

Malcolm Smith, CEO, Sustaine Inc.

Scott Gebicke, CEO, Mighty Buildings

Manuel Schönfeld, CEO, PowerX Technology