

July 12, 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 your leadership in proposing to sunset ENERGY STAR labeling for residential furnaces and central air conditioners (CACs). We, the undersigned public officials, strongly support this proposal and believe it will bring significant benefits to our residents.

ENERGY STAR has a track record of helping guide customers toward products that reduce energy consumption, improve energy security, and reduce pollution. ENERGY STAR is right to evolve its portfolio of certified products and remain at the vanguard of appliance efficiency. Reserving the ENERGY STAR label for the most efficient machines on the market will guide customers to products that reduce air pollution and improve health,¹ reduce GHG emissions,² cost less to operate,³ and perform better.⁴

As local government officials who are on the forefront of the work to mitigate climate change, reduce air pollution, and create resilient communities, we support ENERGY STAR's proposal to sunset its label for residential furnaces and central air conditioners. Thank you to ENERGY STAR for maximizing efficiency, economic, health and climate benefits for our residents.

Sincerely,

¹ RMI & Sierra Club, *Fact Sheet: Why EPA Must Address Appliance Pollution* 1-2 (June 24, 2021), https://rmi.org/wp-content/uploads/2021/04/rmi_factsheet_appliance_pollution.pdf.

² Theresa Pistochini, *Greenhouse Gas Emission Forecasts for Electrification of Space Heating in Residential Homes in the United States*, UC Davis Western Cooling Efficiency Center (Apr. 20, 2021), <https://ucdavis.app.box.com/s/dqja4itdlh1wwicyjh6wag5yswwf97tc>; Rachel Golden & Cara Bottorff, *New Analysis: Heat Pumps Slow Climate Change in Every Corner of the Country*, Sierra Club (Apr. 23, 2020), <https://www.sierraclub.org/articles/2020/04/new-analysis-heat-pumps-slow-climate-change-every-corner-country>.

³ RMI, *Economics of Electrifying Buildings* (2022), <https://rmi.org/economics-of-electrifying-buildings/>; Neil Veilleux et al., *Residential ccASHP Building Electrification Study*, CADMUS (June 3, 2022), https://cadmusgroup.com/wp-content/uploads/2022/06/Residential-ccASHP-Building-Electrification-Study_Cadmus_Final_060322_Public.pdf.

⁴ Heat pumps offer benefits over traditional gas furnaces and central air conditioners including two-in-one heating and cooling, precise temperature control and stability, and lower maintenance costs.

Emmanuel Alcantar, Youth Climate Commissioner, Los Angeles County, CA
Susan AnderBois, City Councilor, Providence, RI
Dan Aymar-Blair, City Councilmember, City of Beacon, NY
Stephen Barr, City Councilmember, City of Littleton, CO
Lisa M. Batey, Mayor, Milwaukie, OR
Melissa Cheatham, Council Member, Overland Park, KS
Laura Dent, Vice Mayor, Harrisonburg, VA
Jen Eyer, City Councilmember, Ann Arbor, MI
Alexis Fineman, Councilmember, San Anselmo, CA
Cobi Frongillo, Town Councilor, Town of Franklin, MA
Logan Heley, Councilmember, Overland Park, KS
Kathie Hoekstra, EPC Chair, Alexandria, VA
Drew Johnstone, Sustainability Officer, Burbank, CA
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Margy Puffenberger, Councilwoman, Maumee, OH
Harvey Rarback, Councilmember, Half Moon Bay, CA
Christiana Rigby, Council member, Howard County, MD
Thomas Rutkowski, Racine County Supervisor, Racine, WI
Melinda Scott, Energy and Community Development Planner, Town of Williston, VT
Kim Stone, Councilmember, City of Highland Park, IL
Missy Stults, Sustainability and Innovations Director, City of Ann Arbor, MI
James R. Walkinshaw, Braddock District Supervisor, Fairfax County, VA