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June 22, 2023

Ms. Abigail Daken  
Manager, ENERGY STAR® HVAC Program  
U.S. Environmental Protection Agency  
E-mail: HVAC@energystar.gov

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

Dear Ms. Daken:

Rheem Manufacturing Company (“Rheem”) appreciates the opportunity to submit the following comments regarding the ENERGY STAR Residential Furnaces and Central Air Conditioners Sunset Proposal (“Proposal.”)

Rheem is an industry leader for total heating, cooling and water heating solutions and one of the few global brands with product offerings covering residential and commercial heating, cooling, conventional and hybrid storage water heaters, tankless water heaters, solar water heating systems, pool and spa heaters, commercial boilers, residential hydronic and geothermal systems, indoor air quality accessories, and replacement parts for all categories. Rheem, headquartered in Atlanta, Georgia, manufactures in Fort Smith, Arkansas; Montgomery, Alabama; Scottsboro, Alabama; Waterbury, Connecticut; and Oxnard, California, and operates distribution facilities throughout the US, Canada and many other countries around the world.

Rheem applauds the Environmental Protection Agency’s (EPA) focus on growth of electric heat pumps and is aligned with the goal of advancing decarbonization and efficiency savings. However, the Proposal to sunset furnaces and central air conditioners (CAC) from the ENERGY STAR program prematurely removes equipment that provides significant energy savings, and which continues to be both necessary and widely used by consumers. CAC remain a necessary form of life-saving air conditioning for consumers, especially where size or cost constraints restrict consumer access to alternatives.

Additionally, residential furnaces are an essential component of rapid heat pump deployment for space heating, with adoption in northern U.S. regions dependent on backup emergency heating in the form of gas heating, a much more efficient and economical form of heating than electric resistance. For example, high-efficiency gas furnaces coupled with heat pumps provide a decarbonization path in northern climates, offering significant energy and emissions savings while taking advantage of technology that is widely available today. Despite impressive advances by manufacturers in recent years<sup>1</sup>, cold climate heat pump technology is still emerging and not widespread to the degree necessary to provide consumers with robust product choice and affordability. For this reason, coupled with cost comparison of natural gas to electricity in many states, Rheem questions the validity of the assertion in

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<sup>1</sup> DOE/EE-2523 • October 2021, rev. February 2022, [“Residential Cold-Climate Heat Pump Technology Challenge: Why are cold-climate heat pumps important?”](#)



INTEGRATED HOME COMFORT



the May 18, 2023, EPA memo to ENERGY STAR stakeholders that, "...if all CACs were replaced by heat pumps about 50 Mt of CO2 would be avoided over 10 years and **billions of dollars in heating costs** would also be saved."

Rheem appreciates that EPA intends to serve as a trusted source for consumers by providing guidance on the use of dual-fuel systems. However, Rheem questions the effectiveness of online information as compared to the easily recognizable and well understood ENERGY STAR logo that can be found directly on the product. Rheem recommends EPA continue to recognize high energy efficiency in both furnaces and CAC so that consumers will be motivated to select the more efficient products in these categories. Absent a certification program for furnaces and CAC, Rheem believes that utilities will simply look to other voluntary efficiency programs for incentive criteria, thus diminishing the value of the ENERGY STAR brand.

Rheem continues to support a national, performance-based efficiency program that recognizes accessible energy-saving products and provides visibility of such to consumers, as originally intended by the ENERGY STAR program. To that end, we respectfully request that this feedback be considered and the Proposal withdrawn accordingly.

Rheem appreciates the opportunity to provide comments and looks forward to continued collaboration.

Sincerely,

A handwritten signature in black ink that reads "Allison J. Skidd".

Allison J. Skidd  
Director, Global Regulatory Affairs – Air  
Rheem Manufacturing Company

CC: Karen Meyers

