



June 22, 2023

Ann Bailey
ENERGY STAR Labeling Branch
US EPA

(Submitted via email to HVAC@energystar.gov)

Re: HVAC Sunset Letter: Proposal to sunset the ENERGY STAR Specifications for Furnaces and Central ACs

Dear Ms. Bailey,

Thank you for the opportunity to submit comments in response to the proposal to sunset the ENERGY STAR Version 4.1 Specification for Furnaces and remove central air-conditioners (CACs) from the ENERGY STAR V6.1 Specification for CAC and Heat Pump Equipment.

Trane Technologies is a world leader in creating comfortable, sustainable, and efficient environments and leading our industry in sustainability practices. Through our strategic brands Trane and Thermo King, and our portfolio of environmentally responsible products and services, we bring efficient and sustainable climate solutions to buildings, homes and transportation. Our bold 2030 Sustainability Commitments are central to our business strategy and include a pledge to reduce our customers' carbon emissions by one gigaton (2% of the world's annual emissions) and to bring our own operations to carbon neutral. Our ambitious greenhouse gas (GHG) emissions reduction targets which have been verified by the [Science Based Targets Initiative \(SBTi\)](#) challenge us to lead by example, collaborate with our customers to drive sustainable innovation and create opportunity for all in our workplace and our communities.

We have a long history of supporting the EnergyStar program and are deeply aligned with its mission to promote the best-in class, most energy efficient products. At Trane Technologies, we believe that in addition to efficiency, electrification is a crucial step towards a net zero carbon future. We applaud EPA on their initiative to incentivize homeowners to make the switch from fossil-fuel burning HVAC units to electric heat pumps and hybrid systems, which are ready solutions that reduce energy costs and consumption, lower carbon emissions, and decrease dependence on fossil fuels.



Trane Technologies offers the following suggestions that EPA may wish to consider as this proposal moves forward, focused on the transition period for sunseting the CAC program in order to minimize emissions from cooling equipment:

- **Sunsetting CACs:** EPA may wish to consider raising the efficiency level for CACs to promote consumer purchase of the most efficient equipment or retaining CACs in the ENERGY STAR V6.1 Specification for CAC and Heat Pump Equipment until 1/1/2026, with no new certifications allowed after 1/1/2025, which aligns with the low-GWP refrigerant transition. Because CACs still dominate the residential cooling market, encouraging higher efficiency products in the ENERGY STAR program would help to prevent backsliding to lower cost, less efficient CACs.

As always, we appreciate your time and consideration of this feedback. Trane Technologies is happy to provide more information as EPA pushes forward this bold proposal.

Sincerely,

A handwritten signature in black ink, appearing to read "JK" or "Jennifer Kane".

Jennifer Kane
Building Decarbonization Policy Leader
Trane Technologies

CC: Helen Walter-Terrinoni, Trane Technologies