

Appliance Standards Awareness Project
American Council for an Energy-Efficient Economy

July 7, 2023

Abigail Daken
EPA Manager, ENERGY STAR HVAC Program
U.S. Environmental Protection Agency
William Jefferson Clinton Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460

RE: ENERGY STAR Residential Boilers Discussion Guide, Proposal to Sunset

Dear Ms. Daken,

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP) and American Council for an Energy-Efficient Economy (ACEEE) on EPA's proposal to sunset the ENERGY STAR specification for residential boilers. We appreciate the opportunity to comment.

We support EPA's sunset proposal. To achieve President Biden's objective of a net-zero economy by 2050, the U.S. will need to drastically reduce fossil fuel use in buildings by transitioning gas and oil appliances and equipment to efficient electric alternatives such as heat pumps. Sunsetting the ENERGY STAR certification pathway for boilers and launching a new specification for air-to-water heat pumps would support this transition.

In 2020, the estimated market penetration for ENERGY STAR gas and oil boilers was 57% and 77%, respectively.¹ While the market share of ENERGY STAR boilers is high, EPA notes that there are no meaningful opportunities for further improvements in efficiency or differentiation among these products.² Under EPA's sunset proposal, incentive programs that encourage consumers to purchase more efficient boilers would still be able to specify an efficiency level and test method or reference a third-party certification,³ instead of relying on the ENERGY STAR certification. Additionally, efficient electric alternatives for hydronic heating, such as air-to-water heat pumps, are becoming increasingly available.

¹ ENERGY STAR Unit Shipment and Market Penetration Report, 2020.

https://www.energystar.gov/sites/default/files/asset/document/2020%20USD%20Summary%20Report_Lighting%20%20EVSE%20Update_0.pdf.

² ENERGY STAR Residential Boilers Discussion Guide.

https://www.energystar.gov/sites/default/files/asset/document/ENERGY%20STAR%20Residential%20Boilers%20Discussion%20Guide_0.pdf?_gl=1*103ldbi*_ga*MTAwNjkzMjc0S4xNjcwNDI3MzMw*_ga_S0KJTVVLQ6*MTY4NTk4ODU4Ny4yODEuMS4xNjg1OTg5MzA5LjAuMC4w.

³ For example, the Consortium for Energy Efficiency (CEE) identifies two tiers of efficiency levels for residential gas-fired boilers. https://library.cee1.org/system/files/library/12048/CEE_ResHVAC_GasSpecs_15Jan2021.pdf.

Furthermore, as EPA noted in the discussion guide,⁴ the passage of the Inflation Reduction Act (IRA) provides an unprecedented opportunity for this transition to efficient electric appliances and equipment. In particular, the tax credits and forthcoming rebates for heat pumps in the IRA will significantly reduce the upfront cost for many consumers.

We also believe that EPA’s proposed timing—sunsetting the ENERGY STAR Version 3.0 Specification for Boilers at the end of 2024, with no new certifications accepted after 2023—is appropriate and provides sufficient time for the market to transition.

Thank you for considering these comments.

Sincerely,



Kanchan Swaroop
Senior Technical Advocacy Associate
Appliance Standards Awareness Project



Steve Nadel
Executive Director
American Council for an Energy-Efficient Economy

⁴ ENERGY STAR Residential Boilers Discussion Guide.
https://www.energystar.gov/sites/default/files/asset/document/ENERGY%20STAR%20Residential%20Boilers%20Discussion%20Guide_0.pdf?_gl=1*103ldbi*_ga*MTAwNjkzMjc5OS4xNjcwNDI3MzMw*_ga_S0KJTVVLQ6*MTY4NTk4ODU4Ny4yODEuMS4xNjg1OTg5MzA5LjAuMC4w.