

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

August 21, 2023

Ann Bailey  
Director, ENERGY STAR Product Labeling  
U.S. Environmental Protection Agency  
William Jefferson Clinton Building  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

**RE: ENERGY STAR® Most Efficient 2023 Update and 2024 Proposed Criteria**

Dear Ms. Bailey,

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP) and the American Council for an Energy-Efficient Economy (ACEEE) on the Energy Star Most Efficient (ESME) 2024 recognition criteria released on July 18, 2023. We appreciate the opportunity to comment.

**We support the proposed criteria for air source heat pumps.** As EPA has proposed to remove one-way central air conditioners from the scope of the ENERGY STAR v6.1 Specification for CAC and Heat Pump equipment (with no new certifications accepted after December 30, 2023), we think that it makes sense for the ESME criteria for 2024 to also exclude one-way central air conditioners. Residential air source heat pumps remain in scope of ENERGY STAR, and EPA has proposed to retain the ESME criteria for ducted heat pumps. For ductless heat pumps, EPA has proposed to align the ESME 2024 criteria with the performance levels required to receive the IRA's 25C tax credit. We think that, at this time, it is appropriate to harmonize recognition of these efficient ductless heat pumps to facilitate adoption in the short-term. However, in subsequent ESME updates, as heat pump adoption expands, we encourage EPA to consider raising the levels to provide greater differentiation in the marketplace that may be valuable for consumers.

**We support updating the CEF levels for clothes dryers.** With an update to ENERGY STAR v2.0 expected in 2024, we think that it makes sense to increase the stringency of the combined energy factor (CEF) criteria for ESME 2024 to ensure that ESME continues to recognize the most efficient products in the market. We also think that it makes sense to designate a new product category for compact electric (120 V) dryers, as EPA has proposed, in recognition of the higher efficiency of this product type. In addition, while we think that manufacturers are likely to optionally report heat pump (or hybrid heat pump) technology, we encourage EPA to make this a required field.

**We encourage EPA to consider additional updates to dehumidifiers.** We support the proposal to raise the criteria for medium capacity portable units (25.01 - 50.00 pints/day) and larger whole home units (>8.0 ft<sup>3</sup>). However, we encourage EPA to also consider an update for the smallest capacity portable units (≤ 25 pints/day) to 1.75 IEF. Of the 181 models in the ENERGY STAR database, 80 meet the ESME criteria.<sup>1</sup> While 82% of those have a rated IEF of 1.70, we believe a more stringent specification of 1.75 IEF would recognize the truly most efficient models on the market.

**We support the proposed updated criteria for dishwashers.** In our comments during the development of the 2023 ESME specification, we encouraged EPA to update the criteria for standard dishwashers. However, the Agency cited the transition to ENERGY STAR v7.0 (with the effective date of July 19, 2023) as motivation to defer consideration of stronger levels.<sup>2</sup> Now, EPA has proposed a more stringent maximum annual energy use level for 2024 ESME that reflects 6% savings compared to ENERGY STAR v7.0 and 27% savings relative to the federal standard (with no update to the water efficiency). We support this level of recognition for these products.

**We support the proposal for refrigerators and freezers but encourage EPA to continue to monitor the market.** EPA has proposed to maintain the stringency of criteria for most product classes, which we believe is appropriate for 2024 ESME. However, as the compliance date for future amended federal standards approaches, we encourage EPA to monitor the market and consider higher stringency in future revisions. EPA has proposed an increase in stringency for one product class—upright freezers—for which the specification would increase energy savings to 20% (up from 15%) relative to the federal minimum. We think that it is appropriate to increase the criteria for upright freezers relative to chest freezers, which generally use less energy and serve a similar function.<sup>3</sup>

**We support the proposed CEER levels for room air conditioners.** EPA has proposed to maintain the 2023 ESME combined energy efficiency ratio (CEER) criteria for product classes 1, 2, 6, and 7, which are the smallest capacity units (all <8,000 Btu/hr cooling capacity) without reverse cycle, at 35% energy savings relative to the federal minimum. For the remaining product classes (≥8,000 Btu/hr cooling capacity without reverse cycle, and all reverse cycle units), EPA proposed an update from 35% to between 46% and 50% savings. The updates for these larger capacity units and units with reverse cycle will align with the new federal standards that will take effect in 2026. We agree with EPA that this is an opportunity to recognize early adopters in the marketplace, while continuing to recognize the smaller capacity units that go beyond the future DOE standards.

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<sup>1</sup>As of 8/7/2023 <https://www.energystar.gov/productfinder/download/certified-dehumidifiers/>

<sup>2</sup>

[https://www.energystar.gov/sites/default/files/asset/document/ENERGY%20STAR%20Most%20Efficient%202023%20Stakeholder%20Comment%20Matrix\\_1.pdf](https://www.energystar.gov/sites/default/files/asset/document/ENERGY%20STAR%20Most%20Efficient%202023%20Stakeholder%20Comment%20Matrix_1.pdf)

<sup>3</sup>

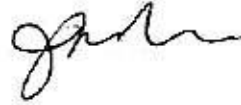
[https://www.energystar.gov/sites/default/files/asset/document/ASAP%20ACEEE%20comments%20ENERGY%20STAR%20most%20efficient%202023%20recognition%20criteria\\_1.pdf](https://www.energystar.gov/sites/default/files/asset/document/ASAP%20ACEEE%20comments%20ENERGY%20STAR%20most%20efficient%202023%20recognition%20criteria_1.pdf)

Thank you for considering these comments.

Sincerely,

Handwritten signature of Rachel Margolis in black ink on a light gray background.

Rachel Margolis  
Technical Advocacy Associate  
Appliance Standards Awareness Project

Handwritten signature of Jennifer Amann in black ink.

Jennifer Amann  
Senior Fellow  
American Council for an Energy-Efficient  
Economy