

October 6, 2022

Ms. Julia Hegarty
U.S. Department of Energy
Office of Energy Efficiency and Renewable Energy
Building Technologies Office, EE-5B
1000 Independence Avenue SW
Washington, DC 20585-0121

**Re: Joint Comments
Proposed Rule, Department of Energy; Energy Conservation Program:
Energy Conservation Standards for Consumer Furnaces; 87 Fed. Reg. 40590
(July 7, 2022) and 87 Fed. Reg. 52861 (Aug. 30, 2022) EERE-2014-BT-STD-0031,
RIN 1904-AD20**

Dear Ms. Hegarty:

On July 7, 2022, the Department of Energy ("DOE"), issued a notice of proposed rulemaking ("NOPR") proposing to revise energy efficiency standards for residential natural gas and propane furnaces.¹ The undersigned organizations, which represent a variety of diverse stakeholder interests and support energy efficiency and conservation, submit these joint comments in opposition to the proposed rule.² The NOPR would eliminate an entire category of gas furnace, *i.e.*, non-condensing furnaces, currently used in millions of homes. The proposal, if adopted, would negatively impact individual homeowners, including senior and low-income households, small businesses, and the overall furnace market. The undersigned organizations request that DOE not implement the proposal.

Currently, approximately 40 percent of non-weatherized natural gas furnaces shipped to customers are non-condensing furnaces that would be eliminated from the marketplace by this NOPR. This is a concern because millions of homes and businesses were designed for non-condensing furnaces that use atmospheric venting systems, which have been the primary exhaust gas venting system in millions of homes, apartments, and businesses for generations. Once DOE eliminates non-condensing furnaces as an option, customers will need to update their existing venting systems to accommodate a new natural gas or propane furnace. Alternatively, DOE's proposal would require many consumers to switch to an electric furnace, which may have higher operating costs and require an upgrade of home or business electrical systems. Neither option is pro-consumer, and DOE's proposal will unnecessarily increase the cost of heating a home or small business in the United States.

In 2020, approximately 59.2 million households had natural gas or propane space heating, and DOE's analysis shows that the proposal will negatively impact, *i.e.*, increase costs for, millions of consumers that can least afford it. Specifically, DOE's data shows that the proposal will result in higher overall costs for 15 percent of senior-only households, 14 percent of low-income households, and 20 percent of small business consumers. Notably, for consumers with mobile homes, 22 percent

¹ *Energy Conservation Program: Energy Conservation Standards for Consumer Furnaces*, EERE-2014-BT-STD-0031, RIN 1904-AD20, 87 Fed. Reg. 40590 (July 7, 2022) and 87 Fed. Reg. 52861 (Aug. 30, 2022).

² Certain of the undersigned organizations, will also file separate detailed comments in this proceeding which, among other things, will address the various legal infirmities within DOE's proposal.

of all customers would be negatively impacted, including 15 percent of senior-only mobile home households and 13 percent of low-income mobile home households. DOE should not issue a rule with such unacceptable impacts on low-income households, seniors, and energy insecure consumers.

Moreover, the negative impact on low-income and senior households is unnecessary. Consumers, where it is economically appropriate for new homes or renovations, are already installing condensing furnaces and other high efficiency units throughout the United States, demonstrating that DOE's proposal is redundant. This high level of voluntary adoption means that DOE does not need to force the installation of condensing furnaces by eliminating the type of furnace that can be installed in their home easily and without retrofitting.

Ultimately, this proceeding will have substantial implications for customers and the marketplace. Modifications to furnace efficiency standards will significantly affect the availability and affordability of consumer heating equipment, so DOE should not eliminate affordable heating options for consumers and small businesses.

Thank you for your consideration.

Sincerely,

American Gas Association
American Pipeline Contractors Association
American Public Gas Association
American Society of Gas Engineers
American Supply Association
Arkansas Gas Association
Consumer Energy Alliance
Distribution Contractors Association
Hearth, Patio & Barbecue Association
Hispanics in Energy
Louisiana Gas Association
Manufactured Housing Institute
National Apartment Association
National Association of Home Builders
National Leased Housing Association
National Multifamily Housing Council
National Propane Gas Association
National Utility Contractors Association
Natural Gas Supply Association
Northeast Gas Association
Plastics Pipe Institute
Plumbing-Heating-Cooling Contractors Association
Rinnai America Corporation
Thermo Products LLC
U.S. Chamber of Commerce
Utility Workers Union of America, AFL-CIO
Williams Furnace Co. dba Williams Comfort Products or
Williams