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Docket No. DE-FOA-0002981*

March 3<sup>rd</sup>, 2023

U.S. Department of Energy  
Office of State and Community Energy Programs  
1000 Independence Ave, SW  
Washington, DC 20585

**RE: AGA’s Comments on DOE’s Request for Information (RFI) On Inflation Reduction Act (IRA): Home Efficiency & Electrification Rebate Programs– DE-FOA-0002981**

Office of State and Community Energy Programs (SCEP):

The American Gas Association (AGA) appreciates the opportunity to comment on the U.S. Department of Energy’s (DOE) Request for Information (RFI) number DE-FOA-0002981 regarding the Home Efficiency & Electrification Rebate Programs, which allocates \$8.8 billion in rebates to help American households save money on energy bills, upgrade to clean energy equipment and improve energy efficiency and reduce indoor and outdoor air pollution, for households. The RFI will help ultimately support the creation of Home Energy Rebate programs that effectively serve U.S. households with technology, products, and services that reduce energy bills, increase home comfort, improve indoor air quality, and reduce carbon emissions.<sup>1</sup>

As discussed in these comments, AGA urges DOE to cast a wide net to capture the broad array of energy-efficient building upgrades– both existing and emerging – that can help achieve the objectives of the Home Efficiency & Electrification Rebate Programs (HEERP). Making sure the rebates are incentivizing the most efficient options according to cost, efficiency, and customer satisfaction should be priority to ensure the rebates are incentivizing behavior that will drive down consumer costs while also reducing emissions. In fact, climate science analysis indicates this approach is necessary and will enable optionality so that communities may choose the most beneficial and workable reduction options given their specific situation.<sup>2</sup> DOE should utilize all energy efficiency technologies that will meet the Home Efficiency & Electrification Rebate Program’s goal of helping eligible U.S. households implement home upgrades to reduce energy bills, increase home comfort, improve indoor air quality, and reduce carbon emissions.

AGA has strong concerns with both the design of the HOMES/HEERP programs and the fundamental assumptions underlying the design of the HEERP program. Following passage of the Inflation Reduction Act (IRA), DOE claimed the HOMES and HEERP programs will

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<sup>1</sup> <https://eere-exchange.energy.gov/Default.aspx#Foald0d75dd4a-ae4c-4efc-84d4-ce4d6c9b95e2>

<sup>2</sup> [IPCC 2022 Mitigation of Climate Change Summary https://www.ipcc.ch/report/ar6/wg3/downloads/report/IPCC\\_AR6\\_WGIII\\_SPM.pdf](https://www.ipcc.ch/report/ar6/wg3/downloads/report/IPCC_AR6_WGIII_SPM.pdf) Page 32. & [US Innovation to Meet 2050 Climate Goals https://www.whitehouse.gov/wp-content/uploads/2022/11/U.S.-Innovation-to-Meet-2050-Climate-Goals.pdf](https://www.whitehouse.gov/wp-content/uploads/2022/11/U.S.-Innovation-to-Meet-2050-Climate-Goals.pdf) Page 7.

save households up to \$1 billion annually.<sup>3</sup> This estimate assumes that switching to electrification will save households money when, in fact, use of natural gas appliances saves families up to \$1,068 a year.<sup>4</sup> Further, bullish estimates on energy savings from electrification fail to mention that the HEERP program does not require a customer to purchase the most efficient product available. With rebates designed to encourage electrification rather than energy savings, customers will have a difficult time utilizing rebates to install the most efficient appliances.

AGA has identified several key concerns with program design, including but not limited to:

- The HEERP program provides non-appliance rebates with no regard for energy savings (a \$4,000 electric service rebate could be used to prepare a home for a jacuzzi).
- For new construction, rebates serve not to upgrade less-efficient equipment but as a payment for new electric appliances.
- Consumers are incentivized to choose all electric when the better choice for energy usage, annual cost, and reduced emissions is natural gas appliances.
  - Electric ranges and ovens do not have Energy Star approval, meaning someone could use a rebate to replace a higher efficiency gas range with a less efficient electric range.
- The HOMES program requires participants to engage in a whole home energy audit and requires modeled energy system savings percentages and corresponding percentage rebate amounts, making the fuel-neutral HOMES program inaccessible and burdensome for applicants.

While a more complete remedy would require statutory revisions, there are steps DOE can and should take during the implementation process to ensure these rebate programs function effectively and increase the likelihood of achieving desired outcomes. We recommend that the program require investments utilizing HEERP rebates to demonstrate energy efficiency improvements rather than allowing participants to utilize rebate funding for any and all electric appliances/equipment. Further, to the maximum extent possible, DOE should allow states the flexibility to redirect unused HEERP funds to the HOMES program so that consumers are able to purchase the most energy efficient appliances/equipment of any fuel type that meets their needs.

With the HEERP program, substantial federal investment in electrification without regard for energy savings, source of energy generation, emissions impacts, and increased monthly utility costs to consumers amounts to federally funded fuel switching with little resulting emissions reductions. An effective way to reduce administrative burdens and ensure government investment that results in increased efficiency would be to allow both HOMES and HEERP funds to be used in a fuel-neutral manner, supporting deployment of all technologies designed to provide energy-efficiency improvements. A HOMES and HEERP rebate program that restricts utilization of all energy efficiency technologies could have the unintended consequences of increasing both costs and emissions. Absent changing the statute to ensure

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<sup>3</sup> <https://www.energy.gov/articles/biden-harris-administration-announces-state-and-tribe-allocations-home-energy-rebate>

<sup>4</sup> <https://playbook.aga.org/share/fast-households>

these programs function as such, DOE should offer states as much flexibility as possible to incent consumers to improve the efficiency of a building and to purchase efficient equipment or appliances using affordable clean fuels that best suit their needs. DOE should prioritize incentivizing the most efficient options while also accounting for cost and customer satisfaction.

## I) Introduction

The American Gas Association, founded in 1918, represents more than 200 local energy companies that deliver clean natural gas throughout the United States. There are more than 77 million residential, commercial, and industrial natural gas customers in the U.S., of which 95 percent — more than 73 million customers — receive their gas from AGA members. AGA advocates for natural gas utility companies and their customers and provides a broad range of programs and services for member natural gas pipelines, marketers, gatherers, international natural gas companies, and industry associates. Natural gas meets more than thirty percent of the United States energy needs today. This is enabled by a pipeline delivery network that stretches more than 2.5 million miles across the U.S. It was this infrastructure that enabled the accessibility of shale gas to customers across the country and ushered in the historical era of energy abundance and affordability, which we still enjoy today. AGA is committed to reducing greenhouse gas emissions through smart innovation, new and modernized infrastructure, and advanced technologies that maintain reliable, resilient, and affordable energy service choices for consumers.<sup>5</sup>

## II) Accessible and Equitable Program Design

**RFI Question 5. How can the Home Energy Rebate programs help to minimize energy burden and costs, particularly in low- and moderate-income (LMI) and high energy burden households?**

AGA and its members are committed to minimizing energy burden and costs and reducing greenhouse gas (GHG), to significantly drive down energy consumption, emissions, and costs for customers participating through smart innovation, new and modernized infrastructure, and advanced technologies that maintain reliable, resilient, and affordable energy service choices for all customers. AGA's members have been instrumental in advancing the deployment of highly efficient end-use products for heating and water heating through the energy efficiency programs they offer their customers, including rebates/incentives to offset the first cost premiums of these products. These programs have encouraged millions of existing gas customers to install the most efficient products available, which has helped to significantly drive down energy consumption, emissions, and costs for customers participating in these programs. Strategically leveraging gas energy efficiency programs at gas utilities as a partner to their states in the Home Efficiency & Electrification Rebate Programs will tap into the vast outreach resources that gas utilities deploy to inform community members, particularly in low- and moderate-income (LMI) and high-energy burden households, of the energy savings opportunities of the programs.<sup>6</sup> Plus, it can minimize customer and contractor frustration to see these efforts complement each other rather than compete. If customers and contractors are

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<sup>5</sup> AGA Climate Change Position Statement, [https://www.aga.org/globalassets/aga\\_climate-change-document\\_final.pdf](https://www.aga.org/globalassets/aga_climate-change-document_final.pdf)

<sup>6</sup> <https://eere-exchange.energy.gov/Default.aspx#FoaId0d75dd4a-ae4c-4efc-84d4-ce4d6c9b95e2>

forced to evaluate multiple options and can lead to decision paralysis that is a noted barrier under behavioral science.

AGA member companies invest more than \$1.4 billion annually to support energy efficiency programs, accelerating efficiency deployment in residential, low-income, multi-family, commercial and industrial sectors. Natural gas savings in North America from these programs amounted to about 500 million therms or 49.96 trillion Btu, the equivalence of 2.64 million metric tons of avoided CO<sub>2</sub> emissions in 2019 alone.<sup>7</sup> These programs reach nearly 7 million residential customers, more than 380,000 low-income customers, nearly 140,000 multi-family customers, more than 130,000 commercial customers, and 41,000 separate industrial program customers. The 120+ gas utility energy efficiency programs offered span every region in the U.S., providing guidance and funding around weatherization, technical assessments, training, and existing and new building programs for equipment replacement and upgrades (e.g., appliances, doors, windows, and thermostats), building retrofits, commercial foodservice, process equipment, energy management systems, and custom process improvements.<sup>8</sup>

**RFI Question 6.** What types of program design approaches, guidelines, tools, savings analyses, policies or reviews can help discourage contractors from using rebates for upgrades that will likely result in higher annual household energy bills, particularly for low-income households?

DOE should provide unbiased and transparent models for states and program administrators to use in calculating household energy costs, site and source energy consumption, and greenhouse gas emissions for all options available for customers. For example, GTI Energy and the Energy Solutions Center offer tools that evaluates the potential implications of energy and technology choices in residential applications by analyzing the energy, environmental, and economic impacts of fuel end use technologies compared to alternatives. Through this evaluation, the tools provide evidence of the technical merits of direct fuel use as an affordable option for energy efficiency programs, building energy codes and standards, regulatory initiatives, or other areas of public policy.

The tools calculate and compare annual energy cost, site and source energy consumption, and greenhouse gas emissions, as well as criteria pollutant emissions, associated with site energy consumption by purchased energy form for alternative technologies providing the same energy services. Electric, natural gas, and propane applications are defined by user-selectable and default inputs for comparisons. The tool shows the potential energy, environmental, and cost benefits of replacing or buying more energy efficient equipment, comparing electric, natural gas, and propane alternatives, based on an annual snapshot or over a life cycle of up to 30 years.<sup>9</sup>

Regarding program approaches and guidelines, rebates for efficient and cost effective “upgrades” should be based on all available alternatives and the rebates provided to the consumer should be based on the alternative with the lower household energy bill. Additionally, AGA wants to emphasize that program approaches mitigate competition with existing programs and the intent of the act is to persuade new customers and low income participants so

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<sup>7</sup> <https://www.aga.org/globalassets/eereport-part-2-final.pdf>.

<sup>8</sup> <https://www.aga.org/globalassets/energy-efficiency-report-partone.pdf>.

<sup>9</sup> <https://cmicepatcalc.gti.energy/>

consideration needs to be given as to how this funding could potentially restrict existing program funding in the future. The Home Energy Rebate program funds should complement existing programs as the structure and guidelines are developed.

### **III) Opt-In Tools, Resources, Technical Assistance, and Partnerships**

**RFI Question 35.** What types of support or technical assistance would be most useful for DOE to provide to states, territories, Indian Tribes, and other program administrators to assist in developing program applications as well as in implementation?

See Answer to RFI Question #6 Above

Both rebate programs, specifically any program with a point-of-sale rebate should include a sufficiently detailed income verification process that both protects customers and the relevant program. States should conduct the income verification so that the integrity of each program, and further, the safety of sensitive consumer information, is managed appropriately. Retailers, installation contractors, and utilities should not be responsible for verifying incomes, providing the personal information related to verifying incomes, or utilizing judgment on a case-by-case basis when engaging in a retail sales transaction involving a point-of-sale rebate. With unused funds within the HEERP program being redistributed to other states, there may be a tendency to work quickly to utilize rebate funds and with a retailer's desire to make a sale, it will be crucial for a neutral party (the State) to ensure that controls are in place preventing fraud or abuse of funds.

### **IV) Eligible Technologies for Rebates**

**RFI Question 46.** How should DOE facilitate that clear information regarding qualifying technologies and projects is readily available to consumers, contractors, retailers, and other relevant stakeholders?

AGA recommends clearly and transparently stating the product categories that are eligible for rebates and those that are not in all the program materials that are distributed and for rebate applications.

#### **Home Venting**

AGA applauds the legislation's inclusion of venting as a necessary and productive use of home rebate funds but has many serious concerns with the design of and goals for the HEERP program. Importantly, within the HEERP program, funding for venting provides a much-needed tool for indoor air quality and provides resources for indoor air quality improvement. In their Indoor Air Quality Summit, the White House issued a call to action and set of guiding principles "to assist building owners and operators with reducing risks from airborne viruses and other contaminants indoors".<sup>1</sup> As the nation continues to deal with the COVID-19 pandemic, indoor air quality is crucial to preventing the spread of airborne illness and creating healthier indoor spaces. AGA applauds inclusion of venting as an eligible expense within the HEERP program and believes proper ventilation in both high-traffic public buildings and for cooking, regardless of energy source, in homes improves air quality outcomes.

Specifically, the act of cooking itself can lead to indoor emissions regardless of cooking surface and cooking fuel. Cooking emissions are primarily affected by the cooking method, vessel, food product, and temperature. For instance, frying food may increase indoor air contaminants during the oxidation of the food and the cooking oil, regardless of energy source. Utilization of indoor venting removes particulate matter and other contaminants resulting from the cooking process and provides cleaner indoor air. Ensuring everyone has access to clean indoor air, particularly while cooking in their own home, is an excellent use of HEERP funds. AGA encourages DOE guidance on HEERP funds to support installation of home and kitchen ventilation systems in homes regardless of whether the home is electric or chooses not to electrify utilizing HEERP funds.

Venting and ventilation also help reduce other sources of indoor air pollution. According to the EPA, “Many reports and studies indicate that the following populations may be disproportionately impacted by indoor asthma triggers, secondhand smoke, mold, radon and other indoor pollutants: children, elderly, low-income, minority, Tribes and indigenous people.”<sup>2</sup> Indoor air quality is not only a matter of health, but also a matter of environmental justice; utilizing HEERP funds aids disproportionately impacted populations from many key sources of indoor air pollution. While indoor air pollution can come from cooking and appliance use, other sources include tobacco products, building materials, household cleaning or beauty products, and outdoor sources of pollution such as radon or pesticides.<sup>3</sup>

Further, the EPA states “Inadequate ventilation can increase indoor pollutant levels by not bringing in enough outdoor air to dilute emissions from indoor sources and by not carrying indoor air pollutants out of the area.”<sup>10</sup> Fixing this venting issue utilizing HEERP funds is an affordable, equitable way to invest in improved indoor air quality and reduction of indoor pollutants.

### **Gas Heat Pumps**

Gas heat pumps are a promising technology for space and water heating that can achieve high heating efficiencies in the range of 130 percent to 140 percent, because they move heat rather than relying solely on combustion.<sup>11</sup> Other efficiency technologies such as gas chillers, gas fuel cells, and micro-CHP should all be considered options, as with proper incentives, can reduce emissions and save consumers money. Gas heat pumps along with efficient gas furnaces and the prior mentioned technologies are solutions that are complimentary to electric technologies that help make net zero goals more affordable and achievable, as compared to attempting to electrify all heat.<sup>12</sup> DOE can provide support and technical assistance to states, territories, Indian Tribes, and other program administrators around fuel-neutral efficiency technologies to implement home upgrades that truly to reduce energy bills and burden as well reduce carbon emissions.

Changes to the 25C Nonbusiness Energy Property Energy Property Credit were made in the Inflation Reduction Act (*Section 13301. Extension, Increase, and Modifications of*

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<sup>10</sup> <https://www.epa.gov/indoor-air-quality-iaq/introduction-indoor-air-quality>

<sup>11</sup> Id., <https://www.aga.org/globalassets/research--insights/reports/aga-net-zero-emissions-opportunities-for-gas-utilities.pdf>, pp.32, 54.

<sup>12</sup> See [Implications of Policy-Driven Electrification - American Gas Association \(aga.org\)](#) (Feb. 2021).

*Nonbusiness Energy Property Energy Property Credit*), now renamed the “Energy Efficient Home Improvement Credit”, makes congressional intent clear that natural gas heat pumps, along with electric heat pumps, are crucial to meeting climate goals. Congress made it clear in the Inflation Reduction Act that natural gas heat pumps have an important role in increasing energy efficiency, lowering energy costs, and fighting the climate crisis. Therefore, the Home Energy Rebate program encouraging increased production/manufacturing/ rebates of electric heat pumps should provide the same opportunity for natural gas heat pumps. Providing guidance and strategy through the Home Efficiency & Electrification Rebate Programs around the emissions reduction potential to customer as well as low- and moderate-income (LMI) and high-energy burden households is imperative to the vast success of the program goals.

New model condensing gas heating and water heating systems with efficiency levels at or above 95 percent efficient would reduce GHG emissions, primarily carbon dioxide from combustion by approximately 14 percent if replacing an existing 80 percent furnace and about 17 percent to 26 percent if replacing an older model. Providing rebates for upgrading existing non-condensing gas heating and water heating systems in low-income and disadvantaged communities would have the added benefit of ensuring continued low energy bills compared to installing electric equipment, and it would reduce heating bills further because less fuel would be needed. Evaluating energy efficiency and GHG emission results should be viewed on a full fuel cycle basis, since using natural gas directly for thermal loads at the customer site is 240 percent more efficient than converting the fuel to electricity and transporting the electricity to the customer.<sup>13</sup>

There are however significant physical and financial barriers to installing a new condensing gas heating or water heating system in an existing home, because unlike traditional non-condensing systems that can be vented vertically via a flue through the roof, a condensing system requires a horizontal vent through a wall to the outdoors. In urban rowhouses or suburban townhouses that share walls, the only avenue outdoors is through a back wall which most likely requires not only new venting but a particularly long horizontal vent through a long narrow dwelling to and through its back wall. This increases the cost as well, which can make it a prohibitive retrofit for low income or even moderate-income homeowners. For lower income rental properties, the landlord typically will seek the least-cost option for replacing equipment, even if that would increase the tenant’s monthly heating bills. In the Department of Energy’s (DOE) July 2022 notice of proposed rulemaking to revise energy efficiency standards for furnaces,<sup>14</sup> DOE estimates the cost for purchasing a new 95 percent condensing furnace is \$3727 and that the average incremental installation costs for “difficult” installations is \$1,003.<sup>15</sup> In our comments on DOE’s proposal, AGA demonstrates that the costs for retrofitting existing homes are actually significantly higher.<sup>16</sup> For new construction, where builders would ideally have better control over the design and installation of a new vent, DOE estimates the cost of a new horizontal vent is, on average, \$1,520.<sup>17</sup> When calculating the 20% efficiency improvement for the HOMES program, enabling equipment should be an eligible part of the program.

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<sup>13</sup> See Gas Technology Institute’s, *Energy Planning Analysis Tool 2022*.

<sup>14</sup> *Energy Conservation Program: Energy Conservation Standards for Consumer Furnaces*, EERE-2014-BT-STD-0031, RIN 1904-AD20, 87 Fed. Reg. 40590 (July 7, 2022).

<sup>15</sup> *Id.* at 40667 and 40632.

<sup>16</sup> Comments of the American Gas Association, Docket No. DOE-EERE-2014-BT-STD-0031 (Oct. 6, 2022).

<sup>17</sup> See DOE Technical Support Document (TSD), Table 8.2.12., p. 90.

State, tribal or local programs established with climate reduction grants could provide incentives or subsidies to help offset these up-front capital and installation costs in whole or in part for retrofitting existing homes and constructing new homes with 95 percent efficient gas heating and water heating systems. This would both help reduce GHG emissions and provide more affordable energy costs, which would be particularly beneficial in low-income and disadvantaged communities that would not otherwise be able to install this new technology.

## V) Buy America and Supply Chain Considerations

**RFI Question 57. Which technologies, products, or materials could face barriers to deployment or accessibility due to cost premiums, supply chain constraints, or other production issues?**

Emerging Gas Heat Pump Technologies Represent a Significant Opportunity to Reduce Customer Energy Consumption, Emissions, and Costs. New gas heat pump technologies have been under development for the last decade, and DOE's Building Technologies Office has helped these products progress through the research and development phases of the product development life cycle. Many gas utilities are now investing in demonstration projects for emerging gas heat pumps, and several products are close to the commercialization phase but need support from HVAC manufacturers to produce the products at scale. These emerging gas heat pump products with efficiency ratings of up to 140% have the potential to reduce energy consumption, emissions, and costs by as much as 50% compared to the most efficient products available on the market today.

As gas utilities look to the future, reimagining pipeline infrastructure for deliveries of energy sources beyond natural gas is just one of the many steps AGA members are taking to promote sustainability, reduce emissions, and maintain commitments to deliver safe, affordable, reliable energy. Gas heat pumps using low-carbon gas resources provide further opportunities to significantly reduce emissions in the US Buildings sector at levels comparable to electric heat pumps with an electric grid served with all renewables. AGA believes that policies that advance the production and deployment of clean, fuel neutral energy efficiency technologies is a key to meeting the Administration's climate goals while ensuring a just energy transition.<sup>18</sup>

## VI) Open Response

**RFI Question 60. What evaluations, research, reports, or other resources can help inform DOE's program guidance?**

AGA recommends reviewing the following resources as DOE develops program design guidance and support for these rebate programs.

- 1) Net-Zero Emissions Opportunities for Gas Utilities<sup>19</sup>

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<sup>18</sup> <https://www.aga.org/globalassets/research--insights/reports/aga-net-zero-emissions-opportunities-for-gas-utilities.pdf>

<sup>19</sup> <https://www.aga.org/research-policy/pathways-to-net-zero/>



- a. This study presents a national-level approach that leverages the unique advantages of gas technologies and distribution infrastructure. Pathways that utilize natural gas and the vast utility delivery infrastructure offer opportunities to incorporate renewable and low-carbon gases, provide optionality for stakeholders, help minimize customer impacts, maintain high reliability, improve overall energy system resilience, and accelerate emissions reductions.
- 2) Low-Carbon Resources Initiative<sup>20</sup>
    - a. An integrated energy system scenario modeling exercise to evaluate alternative technology strategies for achieving economy-wide net-zero emissions of carbon dioxide (CO<sub>2</sub>) in the United States by 2050. This study finds that a broad portfolio of clean energy technologies underpins an affordable and reliable clean-energy transition and offers new insights into three hypothetical net-zero scenarios. One of the key findings of “Optionality Enables Affordability” may offer an additional frame of reference in the request to offer states flexibility in incenting customers.
  - 3) Natural Gas Efficiency Programs Report<sup>21</sup>
    - a. Energy efficiency can be an effective resource for customers, communities, and states to reduce energy costs, provide essential energy services, improve energy reliability and resilience, boost the economy, and reduce the environmental footprint of energy use. Many natural gas utility companies have long-performing natural gas efficiency programs. Based on experience and expertise, and shaped by regulatory oversight and partner engagement, natural gas utilities continue to invest in new strategies to extend energy efficiency options to customers and their communities and to accelerate progress towards realizing a clean energy future.
  - 4) Annual Industry Reports<sup>22</sup>
    - a. CEE has surveyed efficiency program administrators to document trends in the size and impact of the industry. By pointing to the aggregate current year budgets and prior year expenditures and savings, members envision an industry working across jurisdictional boundaries, and stakeholders picture a powerful market force.
  - 5) Appliance Cost and Emissions Comparison 2022<sup>23</sup>
    - a. This study evaluates the critical differences in energy cost and emissions for many common home appliances that use natural gas or rely on other forms of energy. The basis of this study on the characteristics of the average American single-family home and the likely energy consumption for each type of end-use home appliance. The analysis then looks at the current average full-fuel cycle

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<sup>20</sup> [Executive Summary | LCRI Net-Zero 2050 \(epri.com\)](#)

<sup>21</sup> <https://www.aga.org/research-policy/resource-library/natural-gas-utility-efficiency-programs/>

<sup>22</sup> <https://cee1.org/annual-industry-reports>

<sup>23</sup> <https://www.aga.org/research-policy/resource-library/energy-insights-comparison-of-home-appliance-energy-use-operating-costs-and-carbon-dioxide-emissions/>

greenhouse gas emissions for each energy source to evaluate the impact on the environment from each appliance in the coming year.

6) The Difference Between Source and Site Energy<sup>24</sup>

- a. EPA has determined that source energy is the most equitable unit of evaluation for comparing different buildings to each other. Source energy represents the total amount of raw fuel that is required to operate the building. It incorporates all transmission, delivery, and production losses.

## VII) Conclusion

The American Gas Association encourages DOE to consider all energy-saving measures available for the Home Efficiency & Electrification Rebate Programs and strategically leverage gas energy efficiency programs to serve U.S. households with technology, products, and services that reduce energy bills, increase home comfort, improve indoor air quality, and reduce carbon emissions. This would leverage both the past R&D contributions of the DOE's Buildings Technology Office and significant resources gas utilities deploy to help their customers reduce energy costs and carbon emissions. Deploying fuel-neutral energy efficiency technologies for both the Home Efficiency & Electrification Rebate Programs provides an immediate reduction in emissions, and decreases costs, freeing up funds, particularly in low- and moderate-income and high-energy burden households.

AGA would welcome the opportunity to provide additional information related to the creation of program guidance that will assist states, territories, and Indian Tribes in designing, managing, and improving Home Energy Rebate programs. If you have any questions, please contact Sapna Dowla at [sdowla@aga.org](mailto:sdowla@aga.org) or myself.

Respectfully Submitted,

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<sup>24</sup> [The Difference Between Source and Site Energy | ENERGY STAR](#)