

August 21, 2026

The Honorable Chris Wright
Secretary
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585

Re: Energy Conservation Program: Procedures, Interpretations, and Policies for Consideration of New or Revised Energy Conservation Standards and Test Procedures; Docket No. EERE-2025-BT-STD-0001

Dear Secretary Wright:

The undersigned organizations strongly oppose the Department of Energy's proposed revisions to its procedures for establishing appliance and equipment efficiency standards. We urge the Department to withdraw the proposed Process Rule.

At a time when households and businesses are struggling with rising utility bills and communities are facing growing pressures on electric grids and water resources, DOE should be working to accelerate cost-effective improvements in appliance and equipment efficiency. The proposed revisions would instead create new procedural barriers, rigid screening thresholds, and additional litigation risks that could prevent or substantially delay future standards—even when they would reduce consumers' total costs, strengthen the electric grid, and deliver significant environmental benefits.

American households are facing sustained increases in electricity, natural gas, and water costs that have significantly outpaced inflation in recent years. Utility costs now average more than \$3,200 annually for the typical household, and more than one-quarter of Americans face high energy burdens, spending over 15 percent of household income on home energy alone.¹ Residential electricity prices increased by approximately 32 percent between 2020 and 2025,² residential natural gas prices increased by more than 42 percent,³ and water and sewer bills continue to rise faster than inflation.⁴ Millions of households are being forced to cut back on food, health care, education, and other necessities just to pay their utility bills.

According to a November 2025 nationally representative Consumer Reports survey, 68 percent of Americans say home electricity and natural-gas costs strain their household finances, including 23 percent who report that those costs create "a lot" of financial strain.⁵ At the same time, 87 percent of Americans—including large majorities of Democrats, Republicans, and Independents—support requiring new appliances to meet minimum energy-efficiency standards.⁶

Energy efficiency standards are among the nation's most successful consumer affordability policies. They ensure that essential household appliances and commercial equipment do not waste unnecessary energy or water, reducing monthly utility bills automatically without requiring consumers to identify the most efficient products or calculate years of future operating costs.

The savings are substantial. According to DOE, appliance and equipment efficiency standards saved American households and businesses approximately \$105 billion on utility bills in 2024 alone, while saving the typical household approximately \$576 on annual energy and water bills.⁷ DOE also estimates that appliance and equipment standards advanced between 2021 and 2024 will reduce consumer utility bills by more than \$1 trillion over the next 30 years while saving the average family at least \$100 annually through lower utility bills.⁸

The next generation of standards could produce even greater relief. Recent analysis estimates that updating additional federal efficiency standards could reduce the typical household's utility bills by another \$160 per year while saving American businesses nearly \$15 billion annually in operating costs.⁹ These are savings consumers and businesses simply cannot afford to lose.

Efficiency standards are especially important for low- and moderate-income households. As noted by the National Consumer Law Center, low-income families are disproportionately renters, who often don't purchase their appliances. Instead, these renters rely on the purchasing decisions of landlords, who tend to purchase less efficient appliances because they don't have to pay the energy and water bills in the home. DOE's proposed rule will make it more difficult to update efficiency standards, leaving millions of low-income renters consigned to having less efficient appliances installed with consequently larger energy and water bills during a time of rising financial instability.

Efficiency standards also deliver significant benefits for the electric grid, public health, water resources, and the climate. By reducing the amount of energy needed to operate appliances and equipment, efficiency standards reduce peak electricity demand, ease strain on the grid, and help avoid costly investments in new generation, transmission, and distribution infrastructure. These avoided costs benefit all utility customers by helping moderate future rate increases. Absent existing standards, total U.S. electricity consumption would have been 14% higher in 2025, and summer peak electricity demand would have been 115 gigawatts (GW) higher.⁹ Updates to existing standards could reduce summer peak demand by 34 GW in 2040 and 56 GW in 2050.¹⁰

Efficiency standards also save water, which is particularly important in drought-prone regions, while cutting pollution that harms public health and contributes to climate change. Absent existing standards, an additional 1.5 trillion gallons of water would have been wasted in 2025, while an additional 143,000 tons of nitrogen oxides (NO_x) and 238 million metric tons (MMT) of

carbon dioxide (CO₂) would have been emitted.⁹ Updates to existing standards could yield large additional water savings and pollution reductions.¹⁰

These benefits are not separate from the consumer benefits of efficiency standards—they reinforce them. Reducing energy and water waste lowers utility bills while also lowering demand for energy generation, limiting pollution, conserving increasingly valuable water resources, and helping communities avoid the costs associated with new infrastructure and environmental harms.

The proposed Process Rule would undermine these benefits in three important ways.

- First, it would create arbitrary new barriers that could prevent DOE from adopting standards that significantly reduce consumer utility bills, energy demand, water use, and pollution. The proposal establishes rigid energy-savings thresholds and new economic screening tests that could disqualify standards before DOE completes the comprehensive analysis required by Congress.
- Second, it would substantially delay future consumer and environmental benefits by adding unnecessary procedural requirements to an already lengthy rulemaking process. Delay is not cost-free. Every year a cost-effective standard is postponed allows millions of less-efficient products to enter homes and businesses, locking in unnecessarily high utility bills, energy and water waste, and pollution for years to come.
- Third, it would increase litigation risk and discourage future standards by making the Process Rule legally binding and creating new opportunities to challenge otherwise lawful standards on procedural grounds rather than their demonstrated consumer, grid, and environmental benefits.

The proposal also departs from Congress's direction that DOE adopt the maximum improvement in energy efficiency that is technologically feasible and economically justified.

DOE has not demonstrated that the existing Process Rule is failing consumers, undermining environmental protections, or producing standards that do not satisfy the requirements established by Congress. Nor has it adequately evaluated the consumer savings, grid benefits, water savings, pollution reductions, and climate benefits that would be forgone if these new procedural barriers delay or prevent future standards.

At a time when Americans are facing rapidly rising electricity, natural gas, and water bills—and when communities need practical solutions to growing grid, water, air quality, and climate challenges—DOE should strengthen, not weaken, one of the nation's most successful energy efficiency programs. We therefore urge DOE to withdraw the proposed Process Rule and retain a flexible, nonbinding process that enables the Department to adopt standards that

deliver the maximum technologically feasible and economically justified efficiency improvements required by law.

Consumers, communities, and our environment need the benefits of stronger efficiency standards—not new barriers to achieving them.

Thank you for considering our views.

Sincerely,

A Just Harvest
Acadia Center
Alaska Public Interest Research Group
Black Sol Renewable Energy
Ceres
Clean Energy Districts of Iowa
Climate + Energy Project
Cultivating Futures
Democracy Green
Detroit 2030 District
Elevate
Energy Alabama
FEW Energy / THRIVE Collaborative
Georgia Advancing Communities Together, Inc.
Green Projects Group

Hoosier Environmental Council
Kentucky Resources Council
Michigan Environmental Council
Mid-Michigan Environmental Action Council
Midwest Building Decarbonization Coalition
Montana Environmental Information Center
Muscatine County Energy District
NC League of Conservation Voters
Solar United Neighbors
Southwest Energy Efficiency Project (SWEEP)
Texas Energy Poverty Research Institute
Third Act Wisconsin
Vernon County Energy District, Inc
Virginia League of Conservation Voters

Footnotes

1. ACEEE, [Energy Burden Research](#).
2. U.S. Energy Information Administration, [Electric Power Monthly, Table 5.3](#).
3. U.S. Energy Information Administration, [Natural Gas Summary](#).
4. Bluefield Research, [National Water and Sewer Bills Rise 5.1% in 2025, Outpacing Inflation as Utilities Face Rising Cost Pressures](#) (Mar. 9, 2026).
5. Consumer Reports, [November 2025 American Experiences Survey](#).
6. Consumer Reports, [March 2025 American Experiences Survey](#).
7. U.S. Department of Energy, [Appliance and Equipment Standards Program Fact Sheet](#) (2025).
8. U.S. Department of Energy, [DOE Finalizes Efficiency Standards for Residential Clothes Washers and Dryers](#) (Feb. 29, 2024).
9. Appliance Standards Awareness Project, [Appliance Efficiency Standards Lower Utility Bills and Cut Electricity Demand in Every State](#) (Jan. 2026).
10. Appliance Standards Awareness Project, [More Savings Ahead: How Updating National Efficiency Standards Would Reduce Costs in Every State](#), press release and report, June 2026.