Appliance Standards Awareness Project
Earthjustice
Alliance for Clean Energy New York
American Council for an Energy-Efficient Economy
Conservation Law Foundation
Consumer Federation of America
Evergreen Action
National Consumer Law Center, on behalf of its low-income clients
Natural Resources Defense Council
Sierra Club
Southwest Energy Efficiency Project

May 27, 2026

Ms. Julia Hegarty
U.S. Department of Energy
Office of Critical Minerals and Energy Innovation
Building Technologies Office, CM–5B
1000 Independence Avenue SW
Washington, DC 20585

RE: Docket Number EERE–2026–BT–STD–0001: Notification of petition for rulemaking; request for comment

Dear Ms. Hegarty:

This letter constitutes the comments of the Appliance Standards Awareness Project ("ASAP"), Earthjustice, Alliance for Clean Energy New York ("ACE NY"), American Council for an Energy-Efficient Economy ("ACEEE"), Conservation Law Foundation ("CLF"), Consumer Federation of America ("CFA"), Evergreen Action, National Consumer Law Center, on behalf of its low-income clients ("NCLC"), Natural Resources Defense Council ("NRDC"), Sierra Club, and Southwest Energy Efficiency Project ("SWEEP") on the notification of petition for rulemaking to amend the compliance dates of the energy conservation standards for commercial water heaters and consumer furnaces. 91 Fed. Reg. 22477 (April 27, 2026). We appreciate the opportunity to provide input to the Department of Energy ("DOE" or "the Department").

The notice publishes a petition from the American Gas Association, the American Public Gas Association, and the National Propane Gas Association (collectively, "AGA") requesting that DOE extend the compliance dates for the standards until at least January 1, 2030. As adopted, the commercial water heater standards are scheduled to take effect on October 6, 2026, and the consumer furnace standards will take effect on December 18, 2028.

As we explain below, delaying the compliance dates as the petition requests would be unlawful. The Energy Policy and Conservation Act ("EPCA") bars the Department from amending a standard to delay compliance once the standard has been published. Furthermore, even if EPCA's prohibition on weakening standards were somehow inapplicable here, granting the delay requested in the petition would circumvent other statutory criteria applicable to the Department's amendment of adopted standards. These legal defects doom the petition.

However, even if DOE could lawfully delay the compliance dates at issue, the arguments the petition raises in support of delay do not justify amending the compliance dates. Delaying compliance would harm both the users and manufacturers of these products by raising energy bills and undermining investments that manufacturers have already made—a factor which weighs strongly against granting the petition. In contrast, neither AGA's petition for certiorari before the Supreme Court, nor the Department's possible intent to revisit its established policies and procedures justify amending the compliance dates for these products. Accordingly, AGA's petition fails to demonstrate that any delay is warranted.[1]

I. Delaying the compliance dates would be unlawful.

A. Delaying the compliance dates would violate EPCA's anti-backsliding provision.

EPCA's anti-backsliding provision, section 6295(o)(1), plainly applies to the delay of a compliance date for an energy conservation standard. Congress prohibited DOE from prescribing "any amended standard which . . . decreases the minimum required energy efficiency, of a covered product."[2] Delay of the compliance dates applicable to the amended commercial water heater and consumer furnace standards would "decrease[] the minimum required energy efficiency" of those products. Under the regulations prescribed by DOE, those products will be subject to increased energy efficiency standards upon the respective compliance dates for each product. If DOE were to extend the compliance dates, by contrast, those products would be subject to lower standards.

It is of no moment that the Petitioners seek only an amendment to the compliance dates of the standards. The anti-backsliding provision limits DOE's ability to weaken a standard from the date the standard is published—*not* the date it becomes effective or upon which compliance is required. As the U.S. Court of Appeals for the Second Circuit has held, "once an efficiency standard is published, regardless of the fact that manufacturers have a

[1] DOE has already unlawfully delayed the energy conservation standards at issue by failing to complete required reviews to consider updates to the prior standards by the deadlines established in EPCA. *See* Consent Decree at 5, *Nat. Res. Def. Council v. Granholm*, No. 1:20-cv-09127 (S.D.N.Y. Sept. 20, 2022) (requiring completion of overdue reviews for consumer furnaces and commercial water heaters).

[2] 42 U.S.C. § 6295(o)(1).

number of years to bring themselves into compliance, it becomes the 'establish[ed]' standard in the statute's own language, or, in other terms, the 'required' minimum efficiency standard."[3] "Consequently, and in harmony with this congressional regulatory scheme, section 325(o)(1) must be read to restrict DOE's subsequent discretionary ability to weaken that standard *at any point thereafter*."[4]

In this way, amending the compliance date is like any other change to a prescribed standard. The anti-backsliding provision applies to all such DOE actions—those that amend the numerical level of a standard, as well as actions that withdraw standards or exempt products. Such actions "prescribe [an] amended standard," in that, like changes to numerical levels, they establish authoritatively a formal alteration of an energy conservation standard.[5] Such actions may not "decrease[] the minimum required energy efficiency, of a covered product."[6] To do so is barred by section 6295(o)(1). It is not plausible that when Congress prohibited DOE from prescribing "any amended standard which . . . decreases the minimum required energy efficiency, of a covered product," Congress nevertheless intended to permit DOE the discretion to delay updated standards and thereby revert to weaker, superseded requirements.

Nor could DOE delay the compliance date on the theory that anti-backsliding provision does not apply so long as the backsliding involves only standards set by regulation, rather than by statute.[7] That distinction is inconsistent with the statutory text and DOE's long-standing practice. Nothing in the text of EPCA suggests that section 6295(o)(1) is triggered only by energy conservation standards codified in statute. Under EPCA, an energy conservation standard is an energy conservation standard, regardless of whether it is codified in statute.[8] Indeed, in *NRDC v. Abraham*, the Second Circuit considered the application of the anti-backsliding provision to a regulatory standard, and held that section 6295(o)(1) "unambiguously operates to constrain DOE's ability to amend efficiency standards once they are published as final rules in the Federal Register."[9]

Other features of the statute reinforce this straightforward reading. For one, it is implausible to suggest that Congress intended to limit the application of section 6295(o)(1) to statutorily codified standards when it defined the scope of that provision as applying to "any amended standard" for a "covered product." For many covered products, Congress

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[3] *Nat. Res. Def. Council v. Abraham*, 355 F.3d 179, 196 (2d Cir. 2004); *see* 42 U.S.C. § 6295(o)(1).
[4] *Id*. (emphasis added); *see also id*. at 197 (section 6295(o)(1) "cannot be read to operate at the date of manufacturers' compliance").
[5] *See* Prescribe, BLACK'S LAW DICTIONARY (12th ed. 2024); Amend, *id*.
[6] 42 U.S.C. § 6295(o)(1).
[7] *See* 90 Fed. Reg. 20899, 20901 (May 16, 2025).
[8] *See* 42 U.S.C. § 6291(6) (defining "energy conservation standard" without respect to origin); *id*. § 6295(a) (stating that the purpose of the section is to "(1) provide Federal energy conservation standards applicable to covered products; and (2) authorize the Secretary to prescribe amended or new energy conservation standards for each type (or class) of covered product.").
[9] 355 F.3d at 206.

has never codified standards at all; thus, again, the provision cannot reasonably be read to apply exclusively to standards set by Congress. In addition, the remainder of section 6295(o) establishes criteria for DOE's adoption of standards, such as how DOE determines whether a standard level is economically justified. Throughout the subsection, the base case for comparison is the status quo, not any statutory standards, which typically were superseded long ago.[10] Accordingly, whether an amendment to a standard impermissibly relaxes requirements must be determined by measuring the new standard against the current one, not against the levels codified by Congress 20 to 40 years ago.

B. Delaying the compliance dates would violate section 6295's many substantive and procedural requirements.

Not only would delay of the compliance dates violate section 6295(o)(1), but such action would also be subject to the several substantive and procedural requirements that section 6295 imposes for the amendment of energy conservation standards. Petitioners have made no attempt to assist DOE in meeting those requirements. But even if DOE tried to make the findings required under section 6295, it would be unable to do so.

Under EPCA, DOE may amend energy conservation standards only upon making several prerequisite findings. That is true whether DOE acts on its own initiative,[11] or upon a petition requesting an amendment to a standard.[12] Although Petitioners styled their filing as a "PETITION FOR AMENDMENT" and repeatedly requested that DOE "amend" the commercial water heater and consumer furnace standards, they never cite to the provision applicable to petitions for amendments to standards.

That provision, section 6295(n), requires DOE to make the same findings DOE was required to make—and did make—with respect to the earlier rulemakings.[13] As DOE well understands, making those findings is a very significant effort. The Federal Register entries for the rules at issue here span hundreds of pages. Those rulemaking documents are

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[10] *See, e.g.*, 42 U.S.C. § 6295(o)(2)(B)(i)(II)-(V) (requiring DOE to isolate the impacts likely to result from the imposition of the standard under consideration when assessing the economic justification for that standard); *id.* § 6295(o)(4) (preventing the adoption of standards that would likely result in the unavailability of certain product features "generally available in the United States at the time of [DOE's] finding").

[11] *See id.* § 6295(m)(1)(B).

[12] *See id.* § 6295(n)(2).

[13] *See id.* § 6295(o)(1) ("The Secretary may not prescribe *any amended standard* which increases the maximum allowable energy use, or . . . decreases the minimum required energy efficiency, of a covered product." (emphasis added)); *id.* § 6295(o)(2)(A) ("*Any new or amended* energy conservation standard prescribed by the Secretary under this section for any type (or class) of covered product shall be designed to achieve the maximum improvement in energy efficiency, . . . which the Secretary determines is technologically feasible and economically justified." (emphasis added)).

supported by nearly two thousand pages of technical support documents. And they are the product of many years of effort across multiple administrations.

Beyond the extraordinary administrative burden, making the findings required for a standard amendment would be indefensible on the merits here. Most obviously, DOE cannot show that delaying the standards is economically justified.[14] In determining whether an amendment is economically justified, DOE must consider, among other things, the impact on "the manufacturers and on the consumers of the products" subject to the amended standard.[15] Here, the economic impact of the adopted standards on consumers is positive, while any economic burden on manufacturers has almost entirely been absorbed—manufacturers have been making the investments needed to comply with the amended standards and, especially for commercial water heaters, have likely largely completed those investments.[16] Manufacturers stand to recoup those costs over time as they sell new, standards-compliant products. But the result of an amendment delaying the standards' compliance dates will be to postpone the date on which manufacturers begin fully recouping those costs. Thus, if DOE were to attempt to justify a delay amendment, it could not demonstrate that the benefits of such a delay exceed the burdens.[17]

II. The petition fails to demonstrate that delaying the compliance dates for commercial water heaters and consumer furnaces is warranted.

Even if DOE could lawfully delay published standards, and do so without satisfying the EPCA requirements discussed above, the petition provides no support for a determination that such a delay is appropriate. The petition attempts to justify the requested amendments based on unsupported factual claims, including baseless assertions of consumer and manufacturer injury. A decision to grant the petition based on such claims would be arbitrary and capricious.[18]

A. Delaying the compliance dates would increase energy bills for consumers and businesses.

In the 2023 final rule for commercial water heaters, DOE found that for the most common type of equipment—gas-fired storage water heaters—the new standards will save

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[14] *See id*. § 6295(o)(2)(A), (B).
[15] *Id*. § 6295(o)(2)(B)(i)(I).
[16] *See* "Water Heater Standards Are Changing, and Bradford White Is Ready," ASPE Pipeline (Jan. 14, 2025), at https://aspe.org/pipeline/water-heating-standards-are-changing-and-bradford-white-is-ready/ (stating that Bradford White is prepared for the commercial water heater standards, with "current[] . . . products available that are compliant with these new requirements" and that "the company is expanding its high-efficiency commercial and residential offerings").
[17] *See* 42 U.S.C. § 6295(o)(2)(B)(i)(I).
[18] *See Motor Vehicles Manufacturers Assn. of the U.S. v. State Farm*, 463 U.S. 29, 43 (1983) (an agency may not ignore "relevant data" and issue a decision that "runs counter to the evidence before the agency").

businesses $262 each year on average in operating costs, or nearly $2,000 over the life of a commercial water heater.[19] Similarly, in the 2023 final rule for consumer furnaces, DOE found that the new standards will save consumers $51 each year on average in operating costs, or nearly $1,000 over the life of a furnace.[20] DOE estimates that about 130,000 commercial water heaters and 3 million consumer furnaces are sold annually.[21] A delay in the respective compliance dates of even just one year would mean that tens of thousands of businesses[22] and more than a million households[23] would get stuck with higher energy bills not just during the period of the delay, but for the entire life of the equipment, which DOE estimates is 10-25 years for commercial water heaters and 21.5 years for consumer furnaces.[24] Thus, extending the compliance dates for these products would cause significant and irreparable injury to consumers.

AGA attempts to cast the proposed compliance delay for consumer furnaces as a lifeline to "senior-only households, low-income households, and small business consumers."[25] But AGA's petition simply ignores the harsh financial realities that many low-income households face when it comes to paying for utilities, including the issue of split incentives. Because landlords do not typically pay the operating costs of the appliances they purchase for rented properties, they have an incentive to choose inefficient appliances with lower upfront costs, leaving tenants to pay the higher operating costs.[26] Low-income households are especially vulnerable to this phenomenon, as "[a] significantly higher fraction of low-income households are renters compared to the national average."[27] Delaying compliance with the furnace standards would only delay relief for low-income renters, many of whom spend as much as a third of their income on utility bills.[28]

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[19] *See* 88 Fed. Reg. 69686, 69791 Tbl. V.4 (October 6, 2023) (showing the difference between Trial Standard Level (TSL) 0 and the standard level adopted, TSL 3).
[20] *See* DOE, Technical Support Document: Consumer Furnaces at p. 8-48 Tbl. 8.7.1 (Sept. 2023), at https://www.regulations.gov/document/EERE-2014-BT-STD-0031-4100 (showing the difference between Efficiency Level (EL) 0 and the standard level adopted, EL 3).
[21] *See id.* at p. 9-27 Fig. 9.5.1; DOE Technical Support Document; Commercial Water Heaters at p. 9-22 Fig. 9.6.1 (July 2023), at https://www.regulations.gov/document/EERE-2021-BT-STD-0027-0038.
[22] *See* 88 Fed. Reg. at 69761 Tbl. IV.22 (showing that for the most common type of commercial water heater—gas-fired storage water heaters—about 48% of shipments in the no-new-standards case would already meet the standard level adopted, EL 4).
[23] *See* DOE, *supra* note 20, at p. 8-40 Tbl. 8.4.1 (estimating that about 45% of shipments of non-weatherized gas furnaces in the no-new-standards case would meet the standard level adopted, 95% AFUE).
[24] *See* 88 Fed. Reg. at 69755 Tbl. IV.21 (commercial water heater lifetime); 88 Fed. Reg. 87502, 87503 (December 18, 2023) (consumer furnace lifetime).
[25] 91 Fed. Reg. at 22480.
[26] *See* 88 Fed. Reg. at 87577; 88 Fed. Reg. at 69758-59.
[27] 88 Fed. Reg. at 87606.
[28] *Id.* at 87605 (families at or below 150 percent of the poverty line spend as much as 29 percent of income on utility costs).

Finally, AGA's blanket assertion that natural gas is more affordable than electricity misses the point.[29] The commercial water heater and consumer furnace standards require gas appliances to run more efficiently—they do not require consumers to purchase electricity. To the extent that the consumer furnace standards do incentivize some consumers to switch to electric appliances, the Department estimated that the rate of switching will likely be less than 10%,[30] and the standards are economically justified even across the full range of plausible "fuel switching" scenarios.[31] For example, the Department found that even if "the maximum reasonably foreseeable number of consumers" switch from gas to electric, the standards will still be a net benefit for consumers.[32] AGA nowhere addresses these findings in its petition.[33]

B. Delaying the compliance dates would increase emissions that harm human health and the environment.

The standards for both commercial water heaters and consumer furnaces will reduce emissions of carbon dioxide (CO_2) and methane (CH_4), which are greenhouse gases. Based on DOE's analysis, a delay in the respective compliance dates of just one year would increase cumulative CO_2 emissions by about 12 million metric tons (MMT) and cumulative methane emissions by about 160,000 tons.[34] Furthermore, a delay in the respective compliance dates of just one year would increase annual emissions of nitrogen oxides (NO_X) by about 1,700 tons.[35] NO_X is a particulate matter (PM) precursor; exposure to PM pollution can cause cardiovascular diseases and respiratory harm, such as decreased lung function and asthma exacerbation.[36] NO_X also combines with volatile organic compounds (VOCs) to form ozone, which can cause severe harm to the respiratory system.[37] Delaying the compliance dates would therefore harm public health.

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[29] 91 Fed. Reg. at 22480.
[30] *See* 88 Fed. Reg. at 87588 (explaining that the switching fraction of consumers did not exceed 8.9% for either product class).
[31] 88 Fed. Reg. at 87592.
[32] *Id.* at 87587.
[33] *See State Farm*, 463 U.S. at 43 (agency must consider "relevant data").
[34] *See* DOE, *supra* note 21, at p. 13-6 Tbl. 13.2.2; DOE, *supra* note 20, at p. 13-7 Tbl. 13.2.2. DOE estimated first-year CO_2 emissions reductions (i.e., emissions reductions from one year of sales) of 0.102 MMT for commercial water heaters and 0.51 MMT for consumer furnaces, and first-year methane emissions reductions of 1,283 tons and 6,970 tons, respectively. The cumulative estimate assumes a 10-year average lifetime for commercial water heaters and a 21.5-year average lifetime for consumer furnaces.
[35] *See id.* DOE estimated first-year NOx reductions of 276 tons for commercial water heaters and 1,460 tons for consumer furnaces.
[36] American Lung Association, "State of the Air 2026 Report" (Apr. 2026) at 30-31, at https://www.lung.org/getmedia/32f0646d-c5de-4501-b0ac-07cd63c974d4/State-of-the-Air-2026-Report.pdf.
[37] *Id.* at 33-34.

C. Delaying the compliance dates would undermine manufacturer investments and create additional uncertainty.

DOE estimates that more than 90% of commercial water heaters and nearly half of consumer furnaces are manufactured domestically.[38] Both the new standards for commercial water heaters and those for consumer furnaces were finalized more than two years ago.[39] The lead times between final rules and compliance dates are designed to give manufacturers sufficient time to redesign products and re-tool factories to meet new standards. Delaying the compliance dates for commercial water heaters and consumer furnaces would undermine the investments that manufacturers have already made to meet the new standards and upend the certainty on which manufacturers rely.

AGA's petition—which no manufacturers have joined—offers only a conclusory assertion that manufacturers would face sunk costs if the "rules are ultimately deemed unlawful."[40] The obvious flaw in that argument is that the manufacturers have already incurred those investment costs, as described above. The Department cannot grant the petition on this basis with respect to either the commercial water heater or consumer furnace standards.

In the case of commercial water heaters, the new standards are scheduled to take effect in less than five months. We understand that commercial water heater manufacturers are prepared to comply with the October 2026 standards and that delaying the compliance date would only harm manufacturers by upending their plans.[41] AGA's requested delay could require manufacturers to abandon their investments to meet unexpected demand for non-condensing appliances, while advantaging manufacturers who have delayed making investments or who primarily serve foreign markets.

With respect to the consumer furnace standards, the current compliance deadline is over two years away, and AGA provides no supporting data or information on the status of furnace manufacturers' investments to comply with the adopted standards. Without any information on the status of manufacturers' efforts to comply, the Department cannot rationally conclude that a delay would benefit manufacturers.

D. The possibility that DOE may propose changes to its approach in future rulemakings does not justify amending an adopted standard.

Without any supporting explanation, AGA simply asserts that the possibility that DOE is drawing up new policies to govern the adoption of future energy conservation standards

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[38] *See* 88 Fed. Reg. at 69802; 88 Fed. Reg. at 87630.
[39] DOE published the commercial water heaters final rule on October 6, 2023, and the consumer furnaces final rule on December 18, 2023.
[40] 91 Fed. Reg. at 22480.
[41] *See supra* note 16.

somehow makes a delay of the compliance dates for commercial water heaters and consumer furnaces appropriate. But neither of the embryonic initiatives AGA cites has any relevance to the adopted standards for commercial water heaters and consumer furnaces. First, neither of the actions AGA describes has even been proposed at this point. Indeed, the only action DOE appears to have taken to revisit its December 2021 interpretive rule for gas appliances is to create an entry in the Department's regulatory agenda.[42]

Furthermore, even if DOE does act, any final action will not retroactively apply to the standards at issue. For example, even if DOE could lawfully reverse the December 2021 interpretive rule by concluding that non-condensing gas appliances deliver essential and unique performance characteristics to their users (a point we do not concede), that action could only restrict DOE's adoption of *future* energy conservation standards for other types of gas appliances, such as residential boilers or direct heating equipment. A new interpretive rule would not provide a lawful basis for weakening the adopted energy conservation standards for commercial water heaters and consumer furnaces, which, as discussed above, are protected by EPCA's anti-backsliding provision. For the same reason, any revisions to DOE's Process Rule could guide only the adoption of new standards; they could not reach back to undermine the foundation for existing standards. Adopting a new set of rulemaking procedures that the Department may believe work better does not render rules adopted under the prior set of procedures invalid.

E. AGA's request for Supreme Court review does not grant DOE the authority to delay compliance with the standards.

Having declined to seek a judicial stay of the commercial water heater and consumer furnace standards and having lost on the merits in the United States Court of Appeals for the D.C. Circuit, AGA now attempts to leverage its certiorari petition as a basis for DOE to delay the compliance dates for these standards.[43] But in claiming a significant likelihood of "succe[ss] on the merits in a challenge of both rules at the Supreme Court," AGA ignores both the general rarity of the Supreme Court's grants of certiorari and the specific factors that weigh heavily against such an outcome here.[44] For example, DOE's response brief before the Supreme Court did not join AGA's argument that the D.C. Circuit's opinion improperly deferred to the Department's interpretation of EPCA or argue that the question warrants certiorari.[45] Further, no other courts of appeals have issued a decision on the scope of EPCA's "unavailability provision" that conflicts with the D.C. Circuit's ruling.[46]

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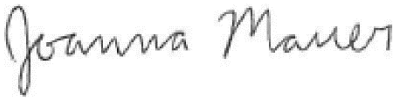
[42] *See* DOE Spring 2025 Unified Agenda entry for this rulemaking *at* https://www.reginfo.gov/public/do/eAgendaViewRule?pubId=202504&RIN=1904-AF71 (indicating DOE would take action on this matter by August 2025).
[43] 91 Fed. Reg. at 22481.
[44] *Id.*
[45] Brief in Opposition for Intervenor Respondents at 2, 13-14, *AGA v. DOE*, S. Ct. No. 25-879 (May 8, 2026).
[46] *Id.* at 20-21.

In addition, according to the Supreme Court's docket, the Court will consider AGA's certiorari petition at its June 4, 2026 conference.[47] It is therefore likely that the Court will determine the outcome of AGA's certiorari petition well before DOE would be able to propose any action in response to AGA's rulemaking petition. At a minimum, it would be unreasonable for DOE to rush into a multi-year delay of the standards before the Supreme Court has even decided whether to grant certiorari.

To whatever extent AGA's "pending petition for writ of certiorari creates near-term uncertainty for manufacturers and the market,"[48] the filing of a judicial challenge to a DOE energy conservation standard does not spontaneously generate legal authority for DOE to delay regulated parties' obligations to comply with that challenged standard. Other statutes do provide specific authorization to certain agencies to stay rules pending review or reconsideration; EPCA does not.[49] Instead, EPCA's anti-backsliding provision bars any DOE attempt to delay compliance with adopted energy conservation standards. DOE must therefore deny the petition.

Thank you for considering these comments.

Sincerely,



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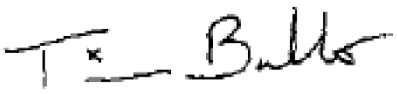

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[47] *See* Docket Entry of May 19, 2026, *AGA v. DOE*, S. Ct. No. 25-879.
[48] 91 Fed. Reg. at 22481.
[49] *See, e.g.*, 42 U.S.C. § 7607(d)(7)(B) (authorizing EPA to stay a rule issued under the Clean Air Act for 3 months pending reconsideration).

/s/ Jennifer Rushlow
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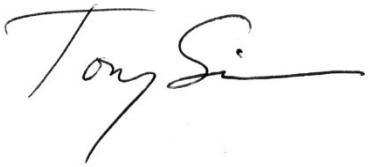

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