

Appliance Standards Awareness Project  
American Council for an Energy-Efficient Economy  
National Consumer Law Center

December 19, 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

**RE: Docket Number EERE-2022-BT-STD-0017: Notification of data availability and request for comment  
Energy Conservation Standards for Miscellaneous Gas Products**

Dear Ms. Hegarty:

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP), the American Council for an Energy-Efficient Economy (ACEEE), and the National Consumer Law Center (NCLC) on behalf of its low-income clients on the notification of data availability (NODA) for energy conservation standards for miscellaneous gas products (MGPs). 87 Fed. Reg. 68931 (November 17, 2022). We appreciate the opportunity to provide input to the Department.

**We support DOE considering a prescriptive requirement that would prohibit the use of a continuous pilot or pilot-on demand ignition system for MGPs.** We believe that additional energy savings may be possible by establishing performance-based energy efficiency standards for these products. However, disallowing standing pilot lights and on-demand pilot light systems would still result in large energy savings. DOE's analysis for the NODA shows that a significant portion of these products have standing pilot lights,<sup>1</sup> which means that a design requirement would provide energy bill savings for many consumers. We therefore support DOE considering a prescriptive requirement that would eliminate wasteful ignition system designs.

**We encourage DOE to consider including gas lights in the scope of MGPs.** In the September 2022 Final Determination of Coverage, DOE established a definition for miscellaneous gas products that includes decorative hearths and outdoor heaters. While we think that gas lights likely meet the definition of decorative hearth product at 10 CFR 430.2, we believe that it also may be appropriate for gas lights to be a third category within MGPs. We encourage DOE to establish a definition for gas lights and collect more information about the ignition mechanisms for this category of products. If standing pilot lights or on-demand pilot light systems are used in these products, we encourage DOE to consider setting standards for gas lights.

Thank you for considering these comments.

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<sup>1</sup> <https://www.regulations.gov/document/EERE-2022-BT-STD-0017-0014>. p. 68939.

Sincerely,



Rachel Margolis  
Technical Advocacy Associate  
Appliance Standards Awareness Project



Amber Wood  
Director, Buildings Program  
American Council for an Energy-Efficient  
Economy



Berneta Haynes  
National Consumer Law Center  
(On behalf of its low-income clients)