



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

RE: Docket Number EERE-2014-BT-STD-0031/RIN 1904-AD20: Notice of Proposed Rulemaking for Energy Conservation Standards for Consumer Furnaces

Dear Ms. Hegarty:

As environmental and climate advocates, we are writing to support the Department’s proposed standards that would substantially improve the minimum efficiency of non-weatherized gas furnaces and mobile home gas furnaces. Energy conservation standards for gas furnaces have not been meaningfully updated in 35 years, and inefficient models emit millions of tons of avoidable greenhouse gas emissions and other pollutants, harming our climate, environment, and human health. Heating is the biggest utility cost for most U.S. households, and outdated inefficient gas furnaces generate high energy bills that particularly burden lower-income households. We strongly support the proposed standard levels and urge DOE to promptly publish a final rule.

Furnaces are one of the longest-lasting appliances in a home, with product lifespans of 20 years or more. Thus, in adopting strong updated standards, the Department will ensure benefits to both consumers' pocketbooks and the planet—instead of locking in inefficient technology for years to come. DOE's analysis for the proposed rule demonstrates that by requiring furnaces to use about 15% less energy, these proposed standards would cut 373 million metric tons of carbon emissions, 5 million tons of methane emissions, and 833 thousand tons of NO_x emissions over 30 years of sales and would provide \$5.9 to \$19.3 billion in net health benefits due to NO_x emissions reductions.¹

The economic benefits of adopting the proposed standards are well-evidenced, as the Department estimates that consumers of both NWGFs and MHGFs would save about \$500 on average over the life of a furnace,² and total net present value savings for consumers would be \$6.2 to \$21.6 billion over 30 years of sale.³ Furthermore, low-income households would experience average payback periods of only 2.1 years and 4.2 years for NWGFs and MHGFs, respectively.⁴ In helping to lower utility bills, these standards can positively impact consumers' health by reducing instances of households having to choose between their basic life necessities like food and medicine and heating their homes. Given that heating bills are such a significant expense for most households, increasing gas furnace efficiency will go a long way toward easing that burden. This is especially pertinent for low-to-moderate income households who have a disproportionately higher energy burden—the portion of income spent on energy costs—on average, than other American households.⁵ Environmental justice communities are already struggling with a myriad of negative impacts from climate change, and high energy burdens only further the unjust damage dealt to populations who are doing the least to cause the climate crisis but suffering the most.

We wholeheartedly agree with the Department's findings that adoption of these proposed standards will simultaneously reduce Americans' monthly energy bills and deliver significant climate impact by cutting emissions—leading to cleaner air and serving as an important step toward combatting the climate crisis. After decades of delay in the adoption of new gas furnace efficiency standards, it is imperative that the Department prioritize swift finalization of this proposed rule.

Sincerely,



Amy Cilimburg
Executive Director
Climate Smart Missoula



Elizabeth Gore
Senior Vice President of Political Affairs
Environmental Defense Fund

¹ 87 Fed. Reg. 40593-40594.

² DOE estimates average life-cycle cost savings of \$464 and \$526 from the proposed AFUE standards for NWGFs and MHGFs, respectively.

³ 87 Fed. Reg. 40679-40682.

⁴ 87 Fed. Reg. 40671.

⁵ Drehtobl, A., L. Ross, and R. Ayala. 2020. *How High are Household Energy Burdens?* Washington, DC: American Council for an Energy-Efficient Economy.

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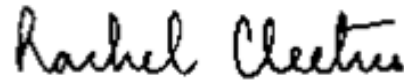
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