



The Heating Solution

To: The Honorable Michael S. Regan

From: Eric Bruton

Cc:

Date: 06/19/2023

Re: Removal of Natural Gas Furnaces from the ENERGY STAR Program

Administrator Regan:

As a commercial gas-fired furnace manufacturer we are deeply concerned by the Environmental Protection Agency's ("EPA") May 18, 2023, proposal to eliminate efficient natural gas furnaces and boilers from the ENERGY STAR program.

Understanding that the proposal is more specifically for residential applications and installations, the question remains on why there is any need to omit gas-fired furnaces from consideration in the ENERGY STAR program. As found in the letter from The American Gas Association ("AGA") dealing with this same subject, "Today, natural gas meets nearly one-third of the United States' energy needs. Currently, 52% of U.S. households use natural gas for space heating in their homes." If a certain energy source (gas) and certain appliance utilization (gas-fired furnace) is used in over half of the homes in America, why would an organization remove any program consideration when dealing with a majority percentage?

The EPA claims that eliminating natural gas furnaces from the ENERGY STAR program would reduce energy consumption, improve energy security, and reduce pollution. The claim goes further to say that there would be significant emissions reductions from its proposal even when source emissions from the power generation is considered. These claims are false. One of the objectives of the ENERGY STAR program is to incentivize the use of efficient appliances to reduce energy consumption. Gas-fired appliances are efficient appliances. The Department of Energy has illustrated in an efficiency proceeding related to furnaces, that fuel switching away from natural gas space heating will increase overall energy use, and end users that switch will have higher overall energy consumption. Since more electricity is needed if customers switch fuel sources, more electricity generation will be required to meet the additional electric load. Today's fossil-fuel power plants have a typical 30-50% fuel conversion efficiency, which is a significant loss of efficiency. That is not equating for the additional transmission losses from power generation to the end use. It is critical for the EPA to understand that the natural gas delivery system is 92% efficient from production to the customer. So, direct use of natural gas is more efficient and has emissions benefits when compared to electrical appliances using energy from the US electrical grid.

The proposed removal of the ENERGY STAR labeling for natural gas furnaces is inconsistent with the EPA's ENERGY STAR Products Program Strategic Vision and Guiding Principles, which recognizes that ENERGY STAR specifications were designed "to treat fuel types separately, so that consumers may find the right products for the fuel type in their home, as most make product replacements without switching fuel types." This proposal is nothing more than a sweeping change to eliminate another fossil-fuel appliance from the



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ENERGY STAR program, and to generate more momentum for electrification and the political policies of this administration. Consumer choice is being revoked. Homeowners are quietly being pushed into all electric appliances, and more energy consumption.

With the quiet proposal changes to residential gas-fired furnaces, one can only think that that the same proposal would make it to the commercial and industrial markets. If this harmful proposal is pushed through the residential industry, then it will be used as the main arguing point for the same changes to other gas-fired appliances and markets.

As a gas-fired appliance manufacturer, and for the reasons above we ask that you withdraw this wrongful proposal.

Thank you,



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