



1030 W. Broad Street, Smithville, TN 37166

June 22, 2023

Ann Bailey, Director
ENERGY STAR Labeling Branch
U.S. Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20460

Submission via HVAC@energystar.gov

Re: EPA's Proposal to Sunset ENERGY STAR Specifications for Furnaces and Other Gas-Fired Appliances

To whom it may concern,

On behalf of Middle Tennessee Natural Gas Utility District and our customers, we are writing in opposition to the Environmental Protection Agency's (EPA's) recent notice regarding ENERGY STAR residential heating, ventilation, and air-conditioning (HVAC) equipment, which was published on May 18, 2023.¹ Concerningly, this proposal outlines plans to phase out the labeling of natural gas furnaces, as well as foreshadows the agency's plans to also sunset similar specifications for gas-fired boilers,² dryers, and commercial packaged boilers.³

Middle Tennessee Natural Gas Utility District (MTNG) was created in 1955 as a municipal corporation pursuant to the Utility District Act of 1937 to support the growth of the communities we serve by providing safe, reliable, and competitive natural gas service. Utility Districts were created to serve areas for-profit companies would not consider; to strengthen rural communities by offering affordable utilities and promoting economic development. We

¹ "HVAC Sunset Letter." Environmental Protection Agency. May 18, 2023.

<https://www.energystar.gov/sites/default/files/asset/document/HVAC%20Sunset%20Letter.pdf>.

² "ENERGY STAR Residential Boilers Discussion Guide." Environmental Protection Agency. June 5, 2023.

https://energystar.gov/sites/default/files/asset/document/ENERGY%20STAR%20Residential%20Boilers%20Discussion%20Guide.pdf?_gl=1*12ywagk*_ga*Mzk2NDI5Mjc0LjE2NzcwMjE1NzI.*_ga_S0KJTVVLQ6*MTY4NzI4MzY2NC4xOC4xLjE2ODcyODM3MzQuMC4wLjA.

³ "Final Draft Version 5.0 ENERGY STAR® Water Heater specification." Environmental Protection Agency. June 1, 2022.

<https://www.energystar.gov/sites/default/files/asset/document/ENERGY%20STAR%20Version%205.0%20Residential%20Water%20Heaters%20Final%20Draft%20Specification%20Cover%20Memo.pdf>.

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serve economically challenged areas of Tennessee of which we know these actions will have a detrimental and disproportionate effect.

According to the ENERGY STAR® Products Program Strategic Vision and Guiding Principles, “[t]he ENERGY STAR product labeling program reduces greenhouse gas emissions by removing barriers in the market that deter consumers and businesses from easily identifying the financial and environmental benefits of purchasing the most energy efficient product model that otherwise meets their needs.”⁴ In the short notice provided to interested stakeholders, EPA did not explain how these proposed changes are aligned with ENERGY STAR’s strategic vision and guiding principles or are in line with the program’s authorizing statute. Our organization would contend phasing out gas furnaces and other gas-fired appliances from the ENERGY STAR program runs counter to the goals.

Natural gas is one of the cleanest burning fuels available. The direct use of natural gas in the home to fuel cooking, water, and space heating, as well as clothes drying, is even more efficient than burning it to produce electricity. Based on 2020 power generation emissions data from the EPA, the use of natural gas can lower household emissions by 17% compared with a home using many minimum-efficiency electric appliances including an ENERGY STAR heat pump for space heating.⁵ Gas-fired appliances become less carbon intense as more renewable natural gas (RNG) is utilized. Biomethane collected from agricultural waste, landfills, and wastewater treatment plants is plentiful and when converted to RNG reduces methane emissions. Similarly, hydrogen, as a part of the fuel mix, will cause fewer appliance emissions.

Natural gas utilities strive to provide dependable natural gas service at an affordable cost. Homes that use natural gas save an average of \$1000 per year compared to a typical electric home.⁶ Nearly 180 million people and more than 5 million businesses in the U.S. rely on natural gas. Policy-driven electrification, like this ENERGY STAR proposal and similar ones proposed by the EPA, will not only result in utility bill increases; it will force consumers to shoulder the cost of replacing the appliances and the correlating equipment they use to heat their homes.

Natural gas should be part of the solution to very complicated energy and environmental issues, not a convenient scapegoat. If the ENERGY STAR program is supposed to help consumers and businesses find environmentally beneficial and affordable appliances, then the ENERGY STAR

⁴ “ENERGY STAR® Products Program Strategic Vision and Guiding Principles.” Environmental Protection Agency. January 2012.

https://www.energystar.gov/ia/partners/prod_development/downloads/guiding_principles_2012.pdf.

⁵ “Comparison of Home Appliance Energy Use, Operating Costs, and Carbon Dioxide Emissions-2022 Update.” American Gas Association. March 1, 2023. <https://www.aga.org/wp-content/uploads/2023/03/Appliance-Cost-and-Emissions-Comparison-2022.pdf>

⁶ *Id.*

label should still be available to gas furnaces and all gas-fired appliances. For these reasons, Middle Tennessee Natural Gas Utility District opposes this proposal and any others that do not allow for gas-fired appliances to be a part of the ENERGY STAR program.

Sincerely,



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