

June 22, 2023

The Honorable Michael S. Regan Administrator
United States Environmental Protection Agency
1200 Pennsylvania Avenue, NW Washington, DC 20460
Via email: HVAC@energystar.gov

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

Administrator Regan:

The Northwest Gas Association (NWGA) is troubled by and disappointed in the Environmental Protection Agency's (EPA) May 18, 2023 proposal to eliminate efficient natural gas furnaces and boilers from the ENERGY STAR program.

If implemented, the proposal would result in profound harm to the EPA's equipment and utility partners, deprive consumers of accurate information about residential heating equipment, and lead to higher energy use and emissions. Perhaps most disturbingly, the proposal undercuts the entire value and purpose of the ENERGY STAR program and should be withdrawn immediately.

The NWGA's members safely and dependably deliver affordable warmth and comfort to almost 10 million Pacific Northwest residents and productive energy to 350,000 businesses, institutions and industries across the region. , founded in 1918, represents more than 200 local energy companies that deliver clean natural gas throughout the United States. Natural gas use in the region comprises 45 percent of total energy use end use (excluding transportation) in the region.

NWGA members support energy efficiency and conservation efforts, including the efficient use of natural gas in homes and businesses. We strongly support the ENERGY STAR program's mission to provide "simple, credible, and unbiased information" on a product's energy efficiency¹ and our members are fully committed to doing their part to create a more efficient energy economy.

ENERGY STAR-certified gas furnaces are a central component of the energy efficiency programs our members deploy. Those programs promote the use of ENERGY STAR home heating equipment and often rely on ENERGY STAR certification when determining eligibility for utility-provided incentives including appliance rebates.

According to Energy Information Administration data, per-customer residential natural gas use across the U.S. has declined by more than 50% since 1970. We've seen similar improvements in per-customer energy efficiency across the Northwest. This steady decline in energy use is a direct result of tighter building envelopes, more efficient

¹ ENERGY STAR Overview, available at <https://www.energystar.gov/about>.

appliances and equipment, behavioral changes in energy consumption, and the effectiveness of natural gas utility efficiency programs, including those that utilize ENERGY STAR. Furthermore, the ongoing decline in energy use also yields corresponding declines in carbon emissions as consumers use natural gas more efficiently and substitute away from more carbon-intensive energy sources. EPA's ENERGY STAR program contributed materially to those successes.

In defense of its proposal to phase out the ENERGY STAR labeling and promotion of residential gas furnaces and to limit ENERGY STAR certification to a small number of electric heating appliances,. Without any supporting analysis, EPA claims that eliminating natural gas furnaces from the ENERGY STAR program will reduce energy consumption, improve energy security, reduce pollution and result in significant emissions reductions even when source emissions from power generation is considered. To the contrary, the presumption that consumers will instead switch to electricity ignores that standard efficiency gas furnaces are more cost effective in many parts of the country and remain the best solution for many consumers. The proposal also fails to consider the fact that consumers who opt to select electric appliances in most parts of the country may actually increase energy consumption, emissions, and pollution.

In short, the NWGA opposes the EPA's proposal to phase out ENERGY STAR certification for high-efficiency natural gas appliances:

- The proposed removal of the ENERGY STAR labeling for natural gas furnaces directly violates EPA's ENERGY STAR Products Program Strategic Vision/Guiding Principles,
- This action will cripple many state-approved utility energy efficiency programs that aid customers in obtaining efficient appliances.
- EPA's support for electrification of the heating sector is ill-informed at best. It will increase energy use and emissions in many if not most parts of the country.
- EPA announced this substantial change to the ENERGY STAR program furtively and without any accompanying analysis giving rise to serious due process concerns.

EPA's proposal is misguided and should be withdrawn in favor of a true and balanced stakeholder process. Thank you for the opportunity to comment.

Sincerely,



DAN S. KIRSCHNER
Executive Director