



Ann Bailey
Director, ENERGY STAR Labeling Branch
United States Environmental Protection Agency

Ms. Bailey:

This letter relates to the May 18, 2023 notice of the United States Environmental Protection Agency's (EPA) outlining the sunset of the ENERGY STAR Version 4.1 Specification for Furnaces and the removal of CAC from the ENERGY STAR V6.1 Specification for CAC and Heat Pump Equipment effective December 30, 2024, with no new certifications accepted after December 30, 2023. These comments reflect the position of the Ohio Gas Association (OGA), an organization dedicated to the entities that work in the support, production, transportation, supply, and delivery of Ohio's robust natural gas industry.

I respectfully request that you consider the environmental, affordability, and reliability benefits associated with the use of natural gas. Because of these important benefits, the OGA respectfully requests that the EPA withdraw its proposed changes to the Energy Star program in order to avoid the disincentives for the installation of natural gas-fueled appliances created by the changes. Below are just some of the important benefits of natural gas:

- Carbon dioxide emissions from residences using natural gas are about 22% lower than those attributable to a typical all-electric home
- Carbon emissions from the average natural gas home decline 1.2 percent per year
- The direct use of natural gas as a fuel source is vastly more efficient than that of other sources used to create electricity because it avoids the massive energy loss that takes place in the conversion process (2nd Law of Thermodynamics)
- Many of the country's natural gas distribution companies, including utilities in Ohio, utilize renewable natural gas (RNG) from sources that would otherwise vent methane directly into the atmosphere
- Homes that utilize natural gas save an average of \$1,000 per year, when compared to the typical all-electric home
- Disruptions to natural gas service are rare. On average, only 1 in 800 natural gas customers experience an unplanned outage in any single year. All electric customers experience an average of one unplanned outage each year.
- An Energy Star natural gas household could have a carbon footprint that is 19% lower than an Energy Star heat pump and 64% lower emissions compared to an electrical resistance furnace
- Natural gas is 3.4 times more affordable than electricity and significantly more affordable than several other residential energy sources for the same amount of energy delivered
- Households that use natural gas for heating, cooking and clothes drying save an average of \$1,068 per year compared to homes using electricity for those applications
- More than 4.1 million jobs are connected to the natural gas industry



On behalf of my members who work hard to provide affordable, reliable, and environmentally friendly natural gas service to the citizens of the State of Ohio, I again respectfully request that the EPA withdraw its proposed changes to the Energy Star certification standards. Disincentivizing the use of natural gas will have a material impact on the natural gas industry in the United States and the millions of people who rely on this important staple of our economy.

Sincerely,

A handwritten signature in blue ink that reads "Jimmy Stewart".

Jimmy Stewart
President
Ohio Gas Association