



October 5, 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 20585-0121

**Re: Comments from the Distribution Contractors Association
*Energy Conservation Program: Energy Conservation Standards for Consumer Furnaces,
EERE-2014-BT-STD-0031, RIN 1904-AD20, 87 Fed. Reg. 40590 (July 7, 2022) and 87 Fed.
Reg. 52861 (Aug. 30, 2022).***

Dear Ms. Hegarty:

The Distribution Contractors Association (DCA) represents contractors, suppliers and manufacturers who provide construction services including installation, replacement and rehabilitation of gas distribution and transmission pipelines as well as fiber optic, cable, and duct systems in communities across the country. DCA appreciates the opportunity to comment on the Department of Energy's ("DOE"), Notice of Proposed Rulemaking (NPRM) proposing to revise energy efficiency standards for residential natural gas furnaces. The NPRM was issued on July 7, 2022.

The NPRM would eliminate an entire category of natural gas furnace, (non-condensing furnaces) which are currently used in millions of American homes and businesses. If adopted, the proposed rule would negatively impact individual homeowners, including senior and low-income households, small businesses, and the overall furnace market. The negative impact on low-income and senior households is unnecessary. Consumers are already installing higher efficiency furnaces across the country, reflecting the redundancy of DOE's proposed rule.

Virtually the entire natural gas industry has publicly supported the goal of achieving net-zero emissions by 2050. However, the often-unpredictable nature of renewables such as solar and wind demonstrates that these energy sources alone will not be able to meet current and future demand. America will simply not be able to achieve its clean energy ambitions without substantial growth of natural gas production and a large expansion of natural gas distribution pipeline networks.

DOE does not need to force the installation of condensing furnaces by terminating the type of furnace that can be installed in their home easily and without retrofitting. Some 40 percent of non-weatherized natural gas furnaces shipped out are non-condensing, and would be eliminated from the marketplace by this NPRM. Millions of homes and businesses were designed for using atmospheric venting systems, which have been the main gas venting system in millions of homes and businesses for generations.

By eliminating non-condensing furnaces as an option, customers will be forced to update their existing systems to accommodate a new natural gas furnace, which would essentially require businesses and families to switch to an electric furnace. This often results in higher operating costs and the need for upgrades to other electrical systems. Ultimately, enactment of this proposal will have substantial implications for both customers and the entire marketplace, and modifications to furnace efficiency standards will significantly affect the availability and affordability of consumer heating equipment.

DCA is also concerned with the precedent that would come with this rulemaking. There are already calls for restricting access and use of natural gas for cooking purposes, and efforts to restrict future use of natural gas will only continue. The bottom line is natural gas actually *enables* the use of renewable energy sources, and the hostility facing the gas industry is unwarranted and shortsighted.

While DCA supports efforts to increase use of renewable energy, but restricting access to one of America's most important natural resource would be a misinformed approach. Therefore, DCA believes DOE should not eliminate affordable heating options for consumers and small businesses, and we encourage the agency to reconsider its position and withdraw the NPRM as written from future consideration.

Best Regards,

A handwritten signature in black ink, appearing to read 'Rob Darden', with a long, sweeping underline.

Rob Darden
Executive Vice President