

Appliance Standards Awareness Project
American Council for an Energy-Efficient Economy
Natural Resources Defense Council
New York State Energy Research and Development Authority
Northwest Energy Efficiency Alliance

January 29, 2024

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

RE: Docket Number EERE–2021–BT–STD–0031/RIN 1904–AF19: Notice of Proposed Determination for Energy Conservation Standards for Oil, Electric, and Weatherized Gas Consumer Furnaces

Dear Ms. Hegarty:

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP), American Council for an Energy-Efficient Economy (ACEEE), Natural Resources Defense Council (NRDC), New York State Energy Research and Development Authority (NYSERDA), and Northwest Energy Efficiency Alliance (NEEA) on the notice of proposed determination (NOPD) for energy conservation standards for oil, electric, and weatherized gas consumer furnaces. 88 Fed. Reg. 83426 (November 29, 2023). We appreciate the opportunity to provide input to the Department.

We encourage DOE to reconsider its proposed negative determination. In the NOPD, DOE tentatively determined that amended AFUE standards for non-weatherized oil-fired furnaces (NWOFs), mobile home oil-fired furnaces (MHOFs), and weatherized gas furnaces (WGFs) are technologically feasible but not needed at this time. DOE stated that it was unable to conclude that amended standards would be economically justified due to the potential manufacturer challenges that may impact the market for these products; however, DOE did not complete a manufacturer impact analysis (MIA) for this NOPD.¹ Nonetheless, DOE's analysis shows that strengthening standards for these products would result in considerable cost savings for consumers. As shown in Table 1, DOE estimated that the max-tech levels would result in up to \$2.1 billion in consumer net present value savings over 30 years of sales.²

¹ 88 Fed. Reg. 83460.

² 88 Fed. Reg. 83458.

Table 1. Potential energy and cost savings from amended standards at max-tech levels³

Product Class	Average Life-Cycle Cost Savings	Cumulative Full-Fuel Cycle National Energy Savings (quads)	Cumulative Net Present Value @ 7% (billion \$)	Cumulative Net Present Value @ 3% (billion \$)
NWOF	\$1,015	0.05	0.03	0.20
MHOF	\$971	0.001	0.01	0.01
WGF	\$223	0.66	0.45	1.88
Total	--	0.71	0.49	2.09

In particular, amended standards for NWOFs could provide significant benefits for consumers. After accounting for the additional costs associated with switching to condensing technology, DOE found that the max-tech level for this product class would provide average life-cycle cost (LCC) savings of more than \$1,000. Even at Efficiency Level 2, which represents an AFUE of 87% and would not require condensing technology, consumers would see average LCC savings of \$820 with less than 2% of consumers experiencing a net cost.⁴ Furthermore, annual operating costs for baseline NWOFs exceed \$2,000,⁵ and NWOFs have an outsized impact on greenhouse gas emissions given the high carbon content of oil. Therefore, improved standards for NWOFs are particularly important for improving energy affordability and contributing to decarbonization goals.

DOE's analysis demonstrates that updated standards are technologically feasible and would result in significant cost savings for consumers. These potential utility bill savings would particularly benefit low-income households, which spend three times more of their income on energy costs compared to non-low-income households.⁶ DOE's proposed determination is thus potentially sacrificing millions of dollars in savings for consumers. For these reasons, we encourage DOE to reexamine its proposed negative determination.

³ 88 Fed. Reg. 83455-83458.

⁴ 88 Fed. Reg. 83455.

⁵ *Ibid.*

⁶ <https://www.aceee.org/sites/default/files/pdfs/u2006.pdf>.

Thank you for considering these comments.

Sincerely,



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