

**Re: Docket Number EERE-2014-BT-STD-0031**

Dear Secretary Granholm:

As state legislators, we are writing to support the Department’s proposal to increase the efficiency level of gas furnaces to 95% AFUE (Annual Fuel Utilization Efficiency). Outdated, inefficient gas furnaces generate high energy bills that particularly burden lower-income households and emit millions of tons of avoidable climate-harming emissions and other pollutants that harm both the environment and human health. We agree with the agency’s findings that adopting this efficiency level will help save consumers significant money on their monthly energy bills while also benefiting the planet by reducing emissions.

Across appliances, gas furnaces are second only to water heaters in terms of level of potential impact of emission reductions.<sup>1</sup> This proposed standard would cut 373 million metric tons of carbon emissions over 30 years of sales. The standard also would reduce emissions of nitrogen oxides— which cause asthma attacks, cardiovascular disease, and even premature death—by more than 830,000 tons. Given the administration’s goals around decarbonization and achieving a net-zero economy by 2050, it is important to prioritize completion of these standards.

The proposed standard would reduce costs for each affected household by nearly \$500 over the life of a furnace, with product life spans of at least 20 years. Heating bills are one of the biggest energy expenses for most households, and those with inefficient (“non-condensing”) gas furnaces face annual average heating bills of about \$700. Increasing gas furnace efficiency will go a long way towards easing the burden, as low-to-moderate income households have a disproportionately higher energy burden on average than other households in America. The payback period for gas furnaces under this proposed standard is only 2.1 years for low-income consumers, at which point these households would be reaping the full financial benefit from the updated standard.<sup>2</sup>

We urge DOE to move forward with this proposed rule for 95% AFUE that utilizes proven technologies for maximizing furnace efficiency. The adoption of strong appliance and equipment standards is integral to the United States achieving its climate goals and serves as an effective, least-cost tool for reducing energy use and greenhouse gas emissions. It is also critical that the Department does not give in to industry delaying tactics, as the strengthening of gas furnace standards has already been delayed and stymied numerous times in the past three decades. We urge you to swiftly finalize the rule and to forgo any delays in its implementation. Thank you for considering this input.

Signed,

Nevada Assembly Member Howard Watts  
(NV-15)

Alaska Representative Andrew Josephson  
(AK-17)

Arizona Representative Andres Cano  
(AZ-3)

Arizona Representative Andrea Dalessandro  
(AZ-2)

Arizona Senator Victoria Steele  
(AZ-9)

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<sup>1</sup>Mauer, J., and A. deLaski. 2020. *A Powerful Priority: How Appliance Standards Can Help Meet U.S. Climate Goals and Save Consumers Money*. Washington, DC: ACEEE; Boston: ASAP.

<sup>2</sup>U.S. Department of Energy, Technical Support Document: Energy Efficiency Program for Consumer Products and Commercial and Industrial Equipment: Residential Furnaces. June 2022. Table 8.7.1.

California Senator Bill Dodd (CA-3)	Hawaii Representative Jeanne Kapela (HI-5)
Colorado Representative Tracey Bernett (CO-12)	Hawaii Representative Matthew LoPresti (HI-41)
Colorado Representative Andrew Boesenecker (CO-53)	Hawaii Representative Nicole Lowen (HI-6)
Colorado Representative Chris Kennedy (CO-23)	Hawaii Representative Amy Perruso (HI-46)
Colorado Representative Emily Sirota (CO-9)	Hawaii Representative Roy Takumi (HI-35)
Colorado Senator Chris Hansen (CO-31)	Hawaii Senator Stanley Chang (HI-9)
Connecticut Representative Jane Garibay (CT-60)	Hawaii Senator Chris Lee (HI-25)
Connecticut Representative David Michel (CT-146)	Illinois Representative Jennifer Gong-Gershowitz (IL-17)
Connecticut Representative Mary Mushinsky (CT-85)	Illinois Senator Cristina Castro (IL-22)
Connecticut Representative Kevin Ryan (CT-139)	Illinois Senator Laura Fine (IL-9)
Connecticut Senator William Haskell (CT-26)	Illinois Senator David Koehler (IL-46)
Delaware Representative Paul Baumbach (DE-23)	Illinois Senator Julie Morrison (IL-29)
Florida Representative Anna Eskamani (FL-47)	Indiana Representative Patricia Boy (IN-9)
Georgia Representative Karla Drenner (GA-85)	Indiana Representative Chris Campbell (IN-26)
Georgia Representative Shelly Hutchinson (GA-107)	Indiana Representative Sue Errington (IN-34)
Georgia Representative Marvin Lim (GA-99)	Iowa Senator Joseph Bolkcom (IA-43)
Georgia Representative Shea Roberts (GA-52)	Kansas Representative Annie Kuether (KS-55)
Georgia Representative Kim Schofield (GA-60)	Kentucky Representative Nima Kulkarni (KY-40)
Georgia Senator Tonya Anderson (GA-43)	Kentucky Representative Mary Marzian (KY-34)
Georgia Senator Nan Orrock (GA-36)	Kentucky Representative Cherlynn Stevenson (KY-88)

Maine Representative Ryan Fecteau (ME-11)	Minnesota Representative David Pinto (MN-064B)
Maine Representative Margaret O'Neill (ME-15)	Minnesota Senator Sandra Pappas (MN-65)
Maine Representative Laurie Osher (ME-123)	Minnesota Senator Ann Rest (MN-45)
Maine Representative Sarah Peabworth (ME-133)	Mississippi Senator Hillman Frazier (MS-27)
Maine Representative Lois Reckitt (ME-31)	Mississippi Senator Robert Jackson (MS-11)
Maine Senator Stacy Brenner (ME-30)	Montana Representative Denise Hayman (MT-66)
Maine Senator Nicole Grohoski (ME-7)	Montana Representative Marilyn Marler (MT-90)
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Maryland Delegate David Fraser-Hidalgo (MD-15)	Nevada Assembly Member Natha Anderson (NV-30)
Maryland Delegate David Moon (MD-20)	Nevada Assembly Member Shannon Bilbray-Axelrod (NV-34)
Maryland Delegate Sheila Ruth (MD-044B)	Nevada Assembly Member Tracy Brown-May (NV-42)
Maryland Delegate Dana Stein (MD-11)	Nevada Assembly Member Lesley Cohen (NV-29)
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Massachusetts Representative Sean Garballey (MA-82)	Nevada Assembly Member Michelle Gorelow (NV-35)
Massachusetts Representative Steven Owens (MA-88)	Nevada Assembly Member Sandra Jauregui (NV-41)
Massachusetts Representative Angelo Puppolo (MA-56)	Nevada Assembly Member Elaine Marzola (NV-21)
Massachusetts Representative Lindsay Sabadosa (MA-57)	Nevada Assembly Member Rochelle Nguyen (NV-10)
Massachusetts Senator Michael Moore (MA-38)	Nevada Assembly Member David Orentlicher (NV-20)
Michigan Representative Kevin Hertel (MI-18)	Nevada Assembly Member Sarah Peters (NV-24)
Minnesota Representative James Long (MN-061B)	Nevada Assembly Member Clara Thomas (NV-17)

Nevada Assembly Member Selena Torres (NV-3)	North Carolina Representative Mary Harrison (NC-61)
Nevada Assembly Member Steve Yeager (NV-9)	North Carolina Senator Natasha Marcus (NC-41)
Nevada Senator Fabian Donate (NV-10)	North Carolina Senator Julie Mayfield (NC-49)
Nevada Senator Patricia Spearman (NV-1)	North Dakota Senator Tim Mathern (ND-11)
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New Hampshire Representative Sherry Dutzy (NH-75)	Ohio Representative Casey Weinstein (OH-37)
New Hampshire Representative Kristina Schultz (NH-100)	Oklahoma Senator Mary Boren (OK-16)
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New Mexico Senator Antoinette Lopez (NM-16)	Pennsylvania Representative Rick Krajewski (PA-188)
New Mexico Senator Gerald Ortiz y Pino (NM-12)	Pennsylvania Representative Danielle Otten (PA-155)
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New York Assembly Member Fred Thiele (NY-1)	Rhode Island Representative Terri-Denise Cortvriend (RI-72)
New York Senator Roxanne Persaud (NY-19)	Rhode Island Representative Rebecca Kislak (RI-4)
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Rhode Island Senator Dawn Euer  
(RI-13)

Tennessee Senator Heidi Campbell  
(TN-20)

Utah Representative Joel Briscoe  
(UT-25)

Utah Senator Jani Iwamoto  
(UT-4)

Vermont Representative Barbara Rachelson  
(VT-30)

Vermont Representative Michael Yantachka  
(VT-21)

Virginia Delegate Elizabeth Guzman  
(VA-31)

Virginia Delegate Patrick Hope  
(VA-47)

Virginia Delegate Kaye Kory  
(VA-38)

Virginia Senator Ghazala Hashmi  
(VA-10)

Washington Representative Debra Lekanoff  
(WA-40)

Washington Representative Sharon Shewmake  
(WA-42)

Washington Senator Liz Lovelett  
(WA-40)

Washington Senator Christine Rolfes  
(WA-23)

Washington Senator Derek Stanford  
(WA-1)

West Virginia Delegate John Doyle  
(WV-57)

West Virginia Delegate Evan Hansen  
(WV-51)

Wisconsin Representative Dave Considine  
(WI-81)

Wisconsin Senator Kelda Roys  
(WI-26)