Congress of the United States Washington, DC 20515

June 8, 2015

The Hon. Ernest Moniz Secretary of Energy U.S. Department of Energy 1000 Independence Avenue, S.W. Washington, D.C. 20585

Dear Secretary Moniz,

We are writing to express strong concern over the Department of Energy's (DOE) recent notice of proposed rulemaking for residential furnaces. While we support energy efficiency, we are extremely concerned that the nationwide 92% standard proposed in this rule will significantly increase costs to natural gas consumers, force them to switch to less efficient alternatives, and ultimately undermine the efficiency goals that underlie the Energy Policy and Conservation Act. The DOE's own data shows that at the proposed 92% efficiency standard (replacing the current 80% standard), over 20% of consumers nationwide and 31% of consumers in the South seeking to replace an existing non-condensing furnace would experience a "net cost" (versus a net benefit) over the life of the furnace. As a result, DOE assumes that over 10% of such consumers in the North and 20% of such consumers in the South would switch from natural gas to electric heat. The fuel switching numbers are even more staggering in the new construction market.

By setting a nationwide energy efficiency standard that precludes a consumer from choosing to install a non-condensing furnace, DOE will be forcing many homeowners either to abandon the use of natural gas to heat their homes or to pay substantially more for the installation of a furnace that meets the new standard. Each of these options will cost residents, regardless of in what part of the country they reside, thousands of dollars. This will have a major impact on the ability of low and fixed income families to replace an aging furnace with the fuel of their choice. Many families will be faced with the difficult choice of having to replace their non-condensing furnace with either a condensing furnace with higher installation costs or electric heat and accompanying higher monthly energy bills.

We strongly encourage DOE to avoid such an "either-or" approach to furnace efficiency, by establishing separate product classes for condensing and non-condensing furnaces, each with its own efficiency standard. We are extremely concerned that requiring the elimination of the economical and efficient non-condensing furnace will place an unnecessary burden on already struggling homeowners in our states.

We thank you in advance for your consideration of our concerns.

Sincerely,

Mo Brooks

Member of Congress

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cc: Kathleen Hogan, Deputy Assistant Secretary for Energy Efficiency

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