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**APGA Files Comments in Response to DOE Proposed Natural Gas Furnace Efficiency Standard**

*Washington D.C. (July 10, 2015)* –Today, APGA filed comments in response to the Department of Energy’s (DOE) Notice of Proposed Rulemaking (NOPR) that proposes a new nationwide 92% efficiency standard for natural gas furnaces. Since the 92% standard can only be met by condensing furnaces, the NOPR would ban the sale of non-condensing furnaces in the United States. Because of the difference in combustion technology, condensing furnaces have additional venting requirements associated with their installation that add significant dollars to their overall costs. A copy of APGA’s comments can be viewed at -

APGA maintains in the comments that the proposed efficiency standard would have an adverse impact on millions of Americans who currently use natural gas to heat their homes. The high initial costs associated with installation requirements for condensing furnaces would push many residential customers—particularly those in warmer climates—to switch from natural gas to less efficient home heating alternatives, such as oil, kerosene and electricity. APGA observed that while it is a longstanding supporter of energy efficiency, it opposes administrative rules that will cause fuel switching and thus move consumers away from a fuel, natural gas, that is more than 90% efficient, to far less efficient alternatives.

APGA’s comments also observed that DOE has made significant analytical, technical and legal errors in the NOPR and underlying technical support documents. As demonstrated in the Gas Technology Institute Report accompanying APGA’s comments, DOE’s reliance on flawed methodologies and older information that is inconsistent with current market data leads to a bias towards the condensing furnace standard proposed in the NOPR. APGA urged DOE to incorporate more robust methodologies and more recent data in its analysis and in doing to recognize that there is no economic justification for the condensing furnace standard DOE is proposing. Rather than impose a one-size fits all approach, APGA urges DOE to establish separate standards for condensing and non-condensing furnaces, , thereby allowing consumer choice driven by rational economics to dictate outcomes, versus an arbitrary rule for which there is no economic support.

Bert Kalisch, APGA’s President & CEO, stated that “It is extremely unfortunate that once again natural gas consumers must protect themselves against overzealous regulations that will drive up the cost of installing a natural gas furnace and, as a result, incentivize inefficient fuel switching. APGA and its members are becoming increasingly concerned about attacks, whether they be in codes and standards or in the guise of efficiency standards, on the direct-use of natural gas.”

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*APGA is the national association of municipally and publicly‐owned local distribution systems. There are about 1000 public gas systems serving more than 5 million customers. These public gas utilities are not‐for‐profit retail distribution entities that are owned by, and accountable to, the citizens they serve. They include municipal gas distribution systems, public utility districts, county districts, and other public agencies that have natural gas distribution facilities.*