

1. [Energy Conservation Standards for Residential Conventional Cooking Products \(EERE-2014-BT-STD-0005\)](#)

Summary

On 8/7/23 DOE issued a NODA on residential cooking products as a follow-up to the SNOPR published on 2/1/23.

In the SNOPR, DOE proposed new and amended energy conservation standards for consumer conventional cooking products that were extremely concerning given the negative impact the proposed efficiency standard would have on gas cooktops.

For more information, see AGA comments submitted on 4/17/23.

In the NODA, DOE states that it is “updating its analysis for consumer conventional cooking products based on stakeholder data and information it received in response to the SNOPR.

DOE requests comments, data, and information regarding the updated analysis by 9/1/23.

AGA is presently analyzing the NODA, including the revised data and how it intersects with the analysis of gas cooktops.

DOE did not formally revise the proposal issued on 2/1/23. The NODA confirms stakeholder objections to the DOE SNOPR, but it remains to be seen how DOE will proceed from here.

It is not clear whether DOE will issue a further SNOPR and seek public comment on a revised efficiency standard which would include an analysis of the impact/availability of products as well as the cost and payback term for consumers.

Initial AGA Analysis

In the NODA, DOE acknowledges considerable errors in its prior analysis. DOE appears to be proposing new efficiency levels that would remove features consumers want, save consumers less money than before, and make more consumers worse off.

- 1) DOE has not proposed new efficiency standards on gas cooking equipment. Rather, the NODA presents an updated analysis related to its earlier rulemaking.
- 2) 59% of the current gas cooktop market would be illegal to manufacture under the new efficiency level two presented. Previously DOE said that half the market would meet it's proposed level (efficiency level 2, or EL2).
- 3) More consumers would see a net cost (35%) than a net benefit (24%). This represents an *increase* in the percentage of consumers that experience a net cost compared with the February 2023 proposed levels (18%)
- 4) life cycle cost savings for gas cooktops at EL2 dropped from \$21.89 to \$6.86. These are total savings over a 14.5-year period. This means consumers would see savings of 4 cents per month on average.
- 5) The net present value of consumer benefits of gas cooktops for the proposed EL2 is negative \$20 - \$90 million over 30 years. Thus there are only costs accumulated to consumers based on this metric.
- 6) Gas ovens show up to \$150 million in net present value costs.

Timeline & Deadlines

- SNOPR published 2/1/23
- AGA comments submitted 4/17/23
- NODA published 8/7/23
- **Comments on NODA due 9/1/23**
 - DOE will accept comments, data, and information regarding the NODA on or before September 1, 2023.
 - Interested persons are encouraged to submit comments using the Federal eRulemaking Portal at www.regulations.gov , under docket number EERE–2014–BT–STD–0005. Follow the instructions for submitting comments. Alternatively, interested persons may submit comments, identified by docket number EERE–2014–BT–STD–0005, by any of the following methods:
 - Email: ConventionalCookingProducts2014STD0005@ee.doe.gov. Include the docket number EERE–2014–BT–STD–0005 in the subject line of the message.

AGA Action

AGA and other stakeholders will be seeking clarification from DOE on how they intend to proceed in this rulemaking proceeding and will seek an extension of the NODA comment deadline.

Based on AGA's objections and concerns articulated in its previously submitted comments, and initial analysis of the NODA, the recommendation is that AGA remains in opposition to the proposal and analysis.

AGA will submit comments on the NODA and plans to send comments for member review before submitting.

More updates will be provided to AGA members as they become available.

2. [Energy Conservation Standards for Consumer Water Heaters \(EERE-2017-BT-STD-0019\)](#)

Summary

On 7/28/23 DOE published the official Federal Register NOPR that provides the specific timetable for comments related to energy conservation standards for consumer (residential gas, electric, and oil) water heaters.

Initial AGA Analysis

- 1) Minimum efficiency level for most popular sizes (20-55 gallon) would not require condensing technology.
- 2) There is concern that the proposed level would reduce vent temperatures, which could result in excessive condensation resulting in venting problems.
- 3) DOE suggests that levels can be met with increasing insulation and the addition of a thermal flue damper or with electronic ignition (no standing pilot light) and an electronic flue damper. The second combination would require electric supply to the gas storage water heater.
- 4) AGA is reviewing the proposed levels and obtaining technical data to ensure that DOE's proposal does not result in problems in gas water heater vents in field installations and that gas storage water heaters will still be available without the need of an external electric supply.
- 5) For the most popular sizes for gas instantaneous water heaters (less than 2 gallon, greater

than 50,000 btu/hr), DOE is proposing an efficiency level that requires condensing technology.

6) This level would eliminate the manufacturing of any instantaneous gas water heaters that are non-condensing and that can be commonly vented with other non-condensing gas appliances such as gas furnaces.

7) There are also concerns and questions on a new product class of gas instantaneous water heater with tank sizes of 2 gallons and inputs of less than 200,000 BTU/hr.

8) Finally, for the most popular electric storage water heaters (tank sizes 20-120 gal) to meet the proposed efficiency level, heat pump technology would be required.

Timeline & Deadlines

- NOPR published 7/28/23
- Comments due 9/26/23

Interested persons and organizations can submit comments identified by docket number EERE-2017-BT-STD-0019, by email (ConsumerWaterHeaters2017STD0019@ee.doe.gov), Federal eRulemaking portal (<http://www.regulations.gov>) and DOE will accept comments, data, and information regarding this NOPR until September 26, 2023.

- DOE will host a webinar on 9/13/23 from 1-4pm

Additional webinar registration information, participant instructions, and information about the capabilities available to webinar participants will be published on DOE's website:

<https://energy.gov/eere/buildings/public-meetings-and-comment-deadlines>

- Find product information for [Consumer Water Heaters](#) including current standards and test procedures, statutory authority, waivers, exceptions and contact information.

AGA Action

AGA plans to seek an extension of the comment deadline.

AGA will provide an outline of concerns and provide draft comments to members for review before the comment deadline.

TBD whether AGA will submit joint comments, file standalone, or both.

3. [Energy Conservation Standards for Consumer Boilers \(EERE-2019-BT-STD-0036\)](#)

Summary

On 7/27/23 DOE issued a pre-publication Federal Register NOPR relating to energy conservation standards for consumer boilers.

DOE proposes amended standards for consumer boilers and announces a public meeting to receive comments on the proposed standards, associated analyses, and results.

For consumer residential gas-fired boilers, DOE is proposing a 95% AFUE minimum efficiency requirement. For gas-fired steam boilers, an 82% AFUE minimum efficiency requirement.

DOE is proposing a slight increase for consumer oil boilers and no increase for consumer electric boilers.

Timeline & Deadlines

DOE will accept comments, data, and information regarding this NOPR until 60 days after date of publication in the Federal Register.

DOE will send a follow-up e-mail once the notice publishes to announce the closing date of the comment period.

Comments can be submitted to docket number EERE–2019–BT– STD-0036, by email (ConsumerBoilers2019STD0036@ee.doe.gov), Federal eRulemaking portal (<http://www.regulations.gov>).

DOE will hold a webinar on Tuesday, September 12, 2023 from 1:00 p.m. to 4:00 p.m. Click here to register for the webinar. Additional webinar registration information, participant instructions, and information about the capabilities available to webinar participants will be published on DOE's website: <https://energy.gov/eere/buildings/public-meetings-and-comment-deadlines>

You can find product information for [Consumer Boilers](#) including current standards and test procedures, statutory authority, waivers, exceptions and contact information.