



December 20, 2023

The Honorable Michael S. Regan
Administrator
United States Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: Removal of Natural Gas Furnaces and Boilers from the ENERGY STAR program

Administrator Regan:

The American Gas Association (AGA) appreciates the valued and productive relationship we have shared with the U.S. Environmental Protection Agency (EPA) for many decades, partnering on many of the EPA's landmark efficiency initiatives including EPA Natural Gas Star and EPA Methane Challenge.

AGA, founded in 1918, represents more than 200 local energy companies that deliver clean natural gas throughout the United States. More than 74 million residential, commercial, and industrial natural gas customers in the U.S. receive their gas from AGA members. Today, natural gas meets nearly one-third of the United States' energy needs in an affordable, efficient way and natural gas utilities administer more than 78 natural gas efficiency programs across 36 states. Natural gas utility spending on energy efficiency programs reached nearly \$1.6 billion in 2020, an increase of 391 percent since 2007. These investments serve, in part, to assist customers with the purchase and installation of the most efficient gas appliances, with great success. In 2020 alone, U.S. natural gas efficiency programs saved 325 million therms of energy, equal to 1.7 million metric tons of greenhouse gas emissions averted. This is the same amount of gas used by approximately half a million homes for one year.

AGA and the undersigned member CEOs support energy efficiency and conservation efforts, which are key to achieving net-zero pathways. However, EPA's recent proposals to eliminate efficient natural gas furnaces and boilers from the ENERGY STAR program are worrisome. Customers in the 52% of U.S. households that use natural gas for space heating in their homes should continue to have access to accurate information about high-efficiency natural gas products provided by the ENERGY STAR program. We respectfully request the pending proposals to sunset certain natural gas products from ENERGY STAR be formally withdrawn and that EPA reiterate the importance of efficient natural gas appliances to the ENERGY STAR program.

Moreover, AGA and its members have long supported ENERGY STAR's mission to provide "simple, credible, and unbiased information" on a product's energy efficiency. Further, AGA has strongly defended the important role of the ENERGY STAR program when previous opponents sought to cut funding or eliminate the program altogether. ENERGY STAR-certified

heating equipment has been a core offering within gas utility efficiency programs, utilizing ENERGY STAR certifications to determine eligibility for incentives and appliance rebates. According to the ENERGY STAR website, “[n]early 840 utilities, plus state/local governments and nonprofits leverage ENERGY STAR in their efficiency programs, reaching roughly 95% of households in all 50 states.” Further, according to the EPA, “[s]ince 1992 ENERGY STAR and its partners have helped American families and businesses save more than \$500 billion in energy costs.” This history underscores the important role natural gas technologies can play in working to achieving a net-zero future through cost-saving energy efficiency solutions. In AGA’s 2022 ICF report “Net Zero Emissions Opportunities for Gas Utilities,” each of the four identified customer decarbonization pathways include expanded energy-efficiency initiatives and incorporate high-efficiency gas furnaces and boilers.

The undersigned appreciate your leadership on this issue and request a meeting with you to discuss the importance of the ENERGY STAR program and ways America’s natural gas utilities can continue to be valuable allies in achieving increased energy efficiency in support of our nation’s energy savings and emissions reduction goals. The requested meeting would build on AGA’s prior discussion with the Office of Atmospheric Protection, which administers the ENERGY STAR program.

Respectfully,

Karen Harbert
President and CEO
American Gas Association

Jerry Norcia
Chairman and CEO
DTE Energy

Lloyd Yates
President and CEO
NiSource

Sid McAnnally
President and CEO
ONE Gas, Inc.

Kurt Adams
President and CEO
Summit Utilities, Inc.

David Anderson
President and CEO
NW Natural

David P. Bauer
President and CEO
National Fuel Gas Company

Brian B. Bird
President and CEO
NorthWestern Energy

Kelcey Brown
President and CEO
MidAmerican Energy

Darin Carroll
Senior Vice President, Natural Gas
Business
CenterPoint Energy

Stanley G. Chapman, III
Chief Operating Officer, Natural Gas
Pipelines TC Energy

Linn Evans
President and CEO
Black Hills Corporation

Rudy D. Garza
President and CEO
CPS Energy

Karen S. Haller
CEO
Southwest Gas Corporation

Kim C. Hanemann
President and Chief Operating Officer
Public Service Electric and Gas Co.

Jeffrey A. Harrison
President and CEO
Citizens Energy Group

Jeffry Householder
President and CEO
Chesapeake Utilities Corporation

Michael A. Huwar
President, Peoples Gas
An Essential Utilities Company

Michael A. Innocenzo
President and CEO
PECO, An Exelon Company

Donald “Blue”
Jenkins President
Washington Gas

Johnny Johnston
Chief Operating Officer
Algonquin Power & Utilities

James Y. Kerr, II
Southern Company Gas
Chairman, President and CEO

Nicole Kivisto
President and CEO
Cascade Natural Gas
Corporation Intermountain
Gas Company Montana-
Dakota Utilities Co.

Michael Lamb
SVP, Customer Delivery – Gas and
Electric Xcel Energy

Scott Lauber
President and CEO
WEC Energy Group

Steve Lindsey
President and CEO
Spire Inc.

Thomas P. Meissner, Jr.
Chairman of the Board and CEO
Unitil Corporation

Paul W. Nester
President and CEO
Roanoke Gas Company

Michael Renna
President and CEO
South Jersey Industries

Garrick Rochow
President and CEO
Consumers Energy

Seth Shapiro
President and CEO
Philadelphia Gas Works

Ryan Shell
President
New Mexico Gas
Company

Dennis Vermillion
CEO
Avista Corp

Helen Wesley
President and CEO
TECO Peoples Gas

Stephen Westhoven
President and CEO
New Jersey
Resources