



Department of Energy
Washington, DC 20585

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Transmitted via email to Matthew Agen (magen@aga.org), Stuart Saulters (ssaulters@apga.org), Benjamin Nussdorf (bnussdorf@npga.org), and Perry McGuire (pmcguire@rinnai.us)

Dear Sirs:

Thank you for your letter dated August 7, 2024, regarding the Department of Energy's (DOE) notice of data availability (NODA) regarding energy conservation standards for gas instantaneous water heaters. In your letter, you state that the NODA and request for comment

and associated documents require careful consideration to develop meaningful stakeholder comments and request that DOE extend the public comment period for an additional 30 days.

In response to your request, DOE notes the limited scope of the NODA. The NODA is intended to provide updates only to specific aspects of DOE's analysis of potential energy conservation standards for gas instantaneous water heaters and to provide an opportunity for stakeholders to submit any additional data and information they wish DOE to consider on this subject. As is described in greater detail in the notice, DOE's analysis from the July 2023 Notice of Proposed Rulemaking (NOPR) was updated to reflect the latest available versions of the data sources used in the rulemaking analyses. Most notably, where DOE previously referenced EIA's 2015 Residential Energy Consumption Survey, DOE has now incorporated the updated 2020 Residential Energy Consumption Survey, as was requested in multiple comments to the July 2023 NOPR. This update is consistent with the May 2024 Final Rule, which addressed other product categories of consumer water heaters. The July 2024 NODA presents updated analytical results, which vary slightly from the results presented July 2023 NOPR due to this update to RECS 2020 and other similar updates to data sources used in the analysis. Additionally, DOE adjusted the installation cost and conversion cost estimates to reflect comments received to the July 2023 NOPR. But the cost-benefit analysis methodology remains largely unchanged and has been subject to extensive stakeholder input and feedback throughout the course of this rulemaking.

On this basis, DOE believes the comment period is sufficient for stakeholders to provide meaningful comments on the notice. Therefore, DOE is not extending the public comment period.

Again, thank you for your letter. I appreciate the opportunity to be of service and trust the information provided is helpful.

Sincerely,

8/15/2024

X Lucas M. Adin

Signed by: Department of Energy

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