

Memorandum

To: United States Department of Energy
Via email: expartecommunications@hq.doe.gov

From: Robin Roy, Natural Resources Defense Council

Date: March 24, 2016

Re: Ex Parte Communication Docket number EERE-2014–BT–STD–0031

On Wednesday March 23, 2016, representatives of the American Gas Association (AGA) and the Natural Resources Defense Council (NRDC) spoke by telephone with representatives of the Department of Energy (DOE) to discuss energy conservation standards for residential furnaces. See Notice of Proposed Rulemaking (NOPR) Energy Conservation Standards for Residential Furnaces, Docket number EERE-2014–BT–STD–0031 [80 FR 55038, March 12, 2015].

The discussion was to explain the support for a Supplementary NOPR (SNOPR) that incorporates efficiency levels that differ by furnace capacity (e.g., large and small), similar to the approach examined in DOE's Notice of Data Availability (NODA) [80 FR 55038, September 14, 2015].

We noted the following:

- The general agreement that a size-differentiated approach could deliver a superior balancing of objectives (including energy savings, consumer outcomes, manufacturer impacts, impact on gas utilities, impact on gas utility customers and environmental emissions) relative to the single size approach presented in the NOPR. This view is consistent with the results presented in the NODA;
- That diverse stakeholders have similarly expressed the view that a size-differentiated approach has advantages relative to a single size standard, including in comments filed on the NODA. That said, there remains a relatively wide range of views regarding what would be an appropriate capacity threshold;
- That publication of a SNOPR, including updated DOE analysis, would prompt valuable input to the Department on the capacity-differentiated approach and might facilitate further productive discussion among stakeholders;
- The view that a broad consensus among stakeholders would be a positive outcome, even if unanimity might not be obtained at this point.

The following individuals were present:

- Judith Greenwald, DOE
- Jenah Zweig, DOE
- John Cymbalsky, DOE
- Eric Stas, DOE
- Johanna Jochum, DOE
- Kathryn Clay, AGA
- Robin Roy, NRDC
- Elizabeth Noll, NRDC
- Benjamin Longstreth, NRDC

Respectfully submitted,

s/ Robin Roy
Natural Resources Defense Council