

**From:** McCurdy, Dave [<mailto:DMcCurdy@aga.org>]  
**Sent:** Wednesday, October 22, 2014 5:47 PM  
**To:** Secretary Moniz  
**Cc:** Knobloch, Kevin; Kenderdine, Melanie  
**Subject:** DOE Furnace Product Class

Dear Secretary Moniz:

Thank you for the opportunity to brief your staff in recent weeks on an impact analysis of a national condensing furnace standard, which was conducted jointly by the American Gas Association (AGA), the American Public Gas Association (APGA), and the Gas Technology Institute (GTI). Our analysis strongly indicates significant adverse consequences are likely to accrue under a national condensing rule standard, if the rule is not configured to minimize the likelihood of fuel switching from natural gas to electrical space and water heating equipment.

As we have expressed to your staff, we are deeply concerned that – if not appropriately structured – this rule could prove to be the first energy efficiency standard issued in the history of the Department that has the real-world impact of *increasing* our nation’s overall energy consumption and carbon footprint. We look forward to working with you and your staff in developing a rule that assures real benefits to the nation.

Sincerely,  
Dave

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The American Gas Association represents more than 200 local energy companies committed to the safe delivery of clean natural gas to over 68 million customers throughout the nation.