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Re: EPA Proposal to Sunset the ENERGY STAR Boilers Specification and Launching a New Specification to Cover Heat Pump Hydronic Heating Appliances (Boiler Sunset Proposal)

I am a principal of GAAS (Gas Analytics & Advocacy Services, LLC). The name sufficiently explains our mission. The essence of our comments today are that EPA's proposals to systematically "sunset" (a.k.a. **eradicate**) gas appliances previously recognized by Energy Star as good for the environment are now bad for the environment and bad for consumers. The same is true of the Biden Administration's "whole of government" policies to serve the interests of those who proclaim that fossil fuels are the primary reason for an "existential threat" of global warming and that rapidly eliminating such fuels with unaffordable and unreliable renewable forms of electric generation is crucial to our survival.

The reason that these Energy Star proposals to eliminate gas appliances are bad for consumers is that appliances powered by the direct use of fossil fuels are generally preferred by consumers for their superior economic affordability and reliability; both in terms of equipment purchases and operating costs (e.g., utility bills and maintenance). Likewise, the direct use of natural gas provides benefits to the electric grid, especially during periods of supply and demand imbalance. That is why many energy utilities combine gas **AND** electricity. While electric generation limitations are more obvious during periods of extremely cold weather, with the publicly obvious benefit of natural gas heating, the direct use of natural gas can also help alleviate electricity shortages during summer peaks. Such environmentally benign (but underutilized) natural gas-fueled technologies include absorption refrigeration, engine-driven refrigeration, desiccants and combined heat and power (CHP). Natural gas fired combined cycles also provide grid-critical backup and balancing to the intermittent and sporadic renewables. Without such, the grid(s) is in danger of collapse just when needed to provide health and safety to the public during dangerous heat events. This risk is documented by NERC, for one, in their Summer Reliability Assessment. (NERC, *2023 Summer Reliability Assessment*, May 2023)

The reason that these Energy Star proposals to eliminate gas appliances are bad for the environment and consumers is that the notion that renewable forms of electric generation offer affordable, clean and reliable alternatives is demonstrably and drastically false when proper cost/benefit and full fuel-cycle analyses are transparently conducted.

GAAS is confident that the laws of physics will prove us right, but that massive (and unnecessary) economic and environmental damage will result before the junk science surrounding renewables is adequately busted. Loss of life is also likely by over reliance of renewably powered electric heat pumps

due to extreme (polar vortex) conditions when wind turbines and photovoltaic panels are inoperable or derated and heat pumps must resort to electric resistance operation. The Biden Administration appears to be hell-bent on stressing an already shaky electric grid beyond its limits. This is the making of a real disaster. Think multiples of the death count from Winter Storm Uri. On top of that is additional massive inflation to supply the envisioned electric energy monoculture. GAAS is very concerned that elevating this ostensible existential threat to emergency status is appearing increasingly likely so that the Biden Administration can force compliance with its ill-conceived central planning policies. Case-in point: [The U.N. Is Planning To Seize Global 'Emergency' Powers With Biden's Support](#).

The scientific and economic analyses to support EPA's radical proposals are conspicuously absent. This supports our conclusion that EPA is acting to promote its own interests for expanding its part of a burgeoning administrative state objective to "electrify everything." Given a change to a more conservative Administration, GAAS will be recommending that Energy Star be "sunsetting" as it appears increasingly incapable of serving any legitimate economic interests of the American public.

In summary and closing, GAAS opposes what Energy Star is proposing and endorses the joint comments of the National Propane Gas Association (NPGA), National Energy & Fuels Institute (NEFI), Energy Marketers of America (EMA), American Gas Association (AGA), American Public Gas Association (APGA), Oilheat Manufacturers Association (OMA), and Plumbing-Heating-Cooling Contractors—National Association (PHCC). Key excerpted highlights of these comments are:

Further, the proposal directly contradicts the purpose and mission of ENERGY STAR. On its website, ENERGY STAR states that the "label provides simple, credible, and unbiased information that consumers and businesses rely on to make well-informed decisions."¹ However, the proposal is unequivocally biased in favor of purchasing electric air-to-water heat pumps, without offering evidence. The EPA confirmed its bias in its June 21 webinar, claiming that it was proposing to sunset the certification for boilers in favor of electrification² and that it was their goal to eliminate fossil fuels at the residential level.³

In the webinar, the EPA specifically stated it would focus on site emissions alone, over the objections of participants on the call.⁴ The EPA claimed it was not possible for them to use a metric for source emissions, though such metrics are readily available,⁵ and are often used by the DOE. Commenters request the EPA explore available metrics, and utilize them to comport with source emissions, and not just the flawed attempt to only analyze site emissions.

Further, the EPA's proposal fails to account for or discuss ENERGY STAR's own use of source emissions.⁶ Instead of evaluating or updating its own analysis on source emissions, the EPA jeopardizes the integrity of the ENERGY STAR program⁷ by failing to provide evidentiary support that includes source emissions, or that electric systems emit fewer emissions. In fact, ENERGY

¹ [About ENERGY STAR | ENERGY STAR](#) (last visited June 2, 2023).

² EPA Webinar on Boiler Sunset, June 21, 2023 at 11:00.

³ EPA Webinar on Boiler Sunset, June 21, 2023 at 25:00.

⁴ EPA Webinar on Boiler Sunset, June 21, 2023 at 1:19:00 and 1:21:00.

⁵ [Welcome - Source Energy and Emissions Analysis Tool \(gastechology.org\)](#)

⁶ [ENERGY STAR, Source Energy, https://portfoliomanager.energystar.gov/pdf/reference/Source%20Energy.pdf](#) (last visited June 22, 2023).

⁷ 42 U.S.C. § 6294a(c)(3) (2022).

STAR's own source emissions information shows that certain electric systems emit more than double the amount of comparable natural gas systems.⁸ The EPA's proposal is directly at odds with foundational documents of the ENERGY STAR program, and must be withdrawn.

Regarding the last excerpt above, the EPA's insistence on using site-based energy efficiency metrics is tantamount to professing an incredibly ridiculous beliefs that electricity is generated inside of electric meters and electricity meters are equipped with electron filters so only the "green" get through.

AGA's [press release](#) and [energy analysis](#) further illustrate Energy Star's societally inequitable proposals. GAAS also suggests that the cumulative effect of Energy Star's sunseting of gas appliances exceeds an overall economic impact of \$100 million; making it a "major rule" (thus requiring a docket with requisite notice and comment procedures).

From the perspective of providing a least-cost energy mix that is economically and environmentally sustainable, a healthy and diverse electric grid and a healthy natural gas grid (as the leading alternative to electricity) should be encouraged, whereas an all-electric energy monoculture should not be.

Sincerely

Mark Krebs

⁸ *Id.* at 2.