



Consumer Federation of America

October 17, 2011

Ms. Brenda Edwards
U.S. Department of Energy
Building Technologies Program
Mailstop EE-2J
1000 Independence Avenue SW
Washington, DC 20585-0121
Via: E-mail: ResFurnaceAC2011-Std-0011@ee.doe.gov

Re: Energy Conservation Standards for Residential Furnaces, Central Air Conditioners and Heat Pumps: Docket Number EERE-2011-BT-STD-0011 and Regulatory Information Number (RIN) 1904-AC06.

Dear Ms. Edwards:

The Consumer Federation of America and the National Consumer Law Center write to express their strong support for the Direct Final Rule for the above-referenced docket which sets new efficiency standards for residential furnaces, central air conditioners and heat pumps.

This Direct Final Rule stems from a consensus agreement among manufacturers, efficiency and consumer advocates. It is highly beneficial --- and impressive --- when the major stakeholders can reach an agreement and streamline the process, and the result helps consumers and the environment. By and large, consumers will save money over the life of the respective products. DOE has stated in the rule published on June 27, 2011, that the estimated life-cycle costs (LCC) savings for consumers are \$155 for non-weatherized gas furnaces in the northern region, and between \$89 and \$107 for split system air conditioners in warmer climates. LCC savings for heat pumps across the country are estimated to be \$104. The regional standards incorporated into this rule appropriately address the extremes in temperatures that different regions in our country experience.

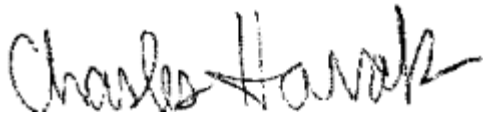
Overall, the aggregate savings are also quite impressive. DOE itself estimates that the furnace standards will save 4 quads of energy by 2045, and that the package of standards in the Direct Final Rule will save consumers \$16 billion or more by 2045 (3% discount rate). These are significant pocketbook and energy savings that DOE should solidify by finally adopting the standards included in the Direct Final Rule.

Both our organizations have been advocating for a 90% AFUE standard in colder regions of the country for more than six years now, because heating bills place such a large burden on moderate and low-income families who struggle to pay their energy bills. A 90% AFUE standard would help get those bills down significantly in a cost-effective manner. Higher furnace standards can substantially reduce the demand for natural gas and thus help to moderate future price increases for consumers across the country.

As we highlighted in our joint comments submitted last year, low-income households especially benefit from higher furnace standards because they are disproportionately renters, not homeowners. The property owner, not the tenant, makes the decision on which furnace to buy and, in the absence of strong regional standards, owners even in cold climates will often buy lower efficiency furnaces and the tenants will bear the higher energy bills resulting from installation of an inefficient unit.

In closing, we wish to reiterate our support for the Direct Final Rule so that all consumers may reap the benefits associated with more efficient furnaces, air conditioners and heat pumps and enjoy lower energy costs and save money over the life of the products. We believe that the strengthened appliance standards will benefit our economy, consumers and the environment.

Sincerely,



Charles Harak, Senior Attorney for Energy Issues
National Consumer Law Center
On behalf of its low income clients



Mel Hall-Crawford, Energy Projects Director
Consumer Federation of America

About the signers:

The National Consumer Law Center (NCLC) is the nation's consumer law expert, helping consumers, their advocates, and public policy makers use powerful and complex consumer laws on behalf of low-income and vulnerable Americans seeking economic justice. For more information, see www.nclc.org. NCLC is located at 7 Winthrop Square, Boston MA, 02110.

Consumer Federation of America (CFA) is a non-profit association of over 280 consumer groups that was founded in 1968 to advance the consumer's interest through advocacy, research, and education. For more information, see www.consumerfed.org. CFA is located at 1620 I Street, NW, Suite 200, Washington, D.C. 20006