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November 22, 2016

The Honorable Ernest Moniz
Secretary of Energy
US, Department of Energy
1000 Independence Avenue SW
Washington, DC 20585

RE: Supplemental Notice of Proposed Rulemaking (SNOPR) – Energy Conservation Standards for Residential Furnaces – Docket No. EERE-2014-STD-0031

Dear Secretary Moniz:

As the Chair of the House Philadelphia Delegation in the Pennsylvania General Assembly, I am submitting the following comments on behalf of myself, my constituents and the other members of the House/Senate Philadelphia delegation who represent the residents of Philadelphia.

We, the House Philadelphia Delegation, strongly believes this furnace rule, although intended to increase efficiency, is not reasonable and fails to recognize that there are situations in which homeowners may not be able to install a condensing furnace in their home, or may not be able to afford the additional costs associated with this type of furnace. Additionally, we believe this rule will disproportionately impact the substantial number of low and middle income row house residents who will no longer be able to install non-condensing furnaces.

If implemented as proposed, this rule would effectively prohibit the use of non-condensing furnaces, therefore negatively impacting our constituents, the 500,000 plus residents of Philadelphia, who rely on natural gas in the following ways:

1. This proposal would eliminate what has been the only affordable option for many Philadelphians when they need to replace their furnaces.
 - a. The cost of a condensing furnace is over \$300 more expensive than a non-condensing furnace along with the added installation costs from additional venting requirements of condensing furnaces in high density housing areas.



2. In high density areas including: condominiums, apartments, row houses and duplexes, condensing furnaces may not be able to be installed.
 - a. This rule, in many cases, ends the ability for Pennsylvanians living in a condominium, an apartment, a rowhome and many duplexes, to use gas to heat their home. In Philadelphia alone this will impact over 400,000 homes currently using the most affordable option on the market.
3. If condensing furnaces are able to be installed than the impact will most likely be felt through the added costs associated with installation, which can be significant.
 - a. In many cases, even homes capable of handling a condensing furnace will still be forced to pay an additional \$2,000 in installation costs. That \$2,000 additional cost will look minute compared to the costs associated with the hundreds of thousands of homes that are not equipped to handle condensing furnaces.

On behalf of ourselves and the residents of Philadelphia, we respectfully request that, for the reasons discussed above, the Department of Energy withdraw the Supplemental Notice of Proposed Rulemaking.

Respectfully Submitted,

Maria P. Donatucci

A handwritten signature in black ink that reads "Maria P. Donatucci".

Member, 185th Legislative District
Chair, Philadelphia House Delegation

cc: John Cymbalsky