**Condensing Furnace Standard**

**Department of Energy Residential Furnace Standards Rulemaking**

Supporters and Opponents

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| PG&E Position | Key Supporters of Position | Counter Position | Key Supporters of Counter Position |
| Support DOE proposed condensing furnace standard as cost effective the nation and California. Analysis is correct. | * NEEP * ACEEE * CEC * NRDC * EEI * Earthjustice * The Consumer Federation of America * National Consumers Law Center * Massachusetts Union Of Public Housing Tenants * Texas Ratepayers' Organization to Save Energy | **DOE should withdraw rulemaking since it is not cost effective because the analysis is flawed** | * SCG * AGA * APGA * AHRI * HARDI * ACCA * NAHB |

**Key Issues**

* For non-decoupled gas utilities, energy efficiency reduces revenues
* For SCG, a decoupled gas-only utility in California, opposing efficiency will be a threat to their business
* PG&E’s customers, low income renters in particular, benefit from higher efficiency furnaces
* Furnace standards have not been updated for more than 30 years
* DOE and PG&E cost effectiveness and feasibility analyses are rigorous providing a solid foundation for our support condensing furnaces become the standard
* PG&E conducted a review of DOE cost effectiveness methods and assumptions (incremental cost, installed cost, gas savings, etc.) and verified that condensing furnaces are cost effective
* Feasibility issues related to difficult installations (row houses in Philadelphia) were researched and found to be either exaggerated or properly incorporated into the DOE analysisOpposition analysis by Gas Technology Institute (GTI) analysis uses the DOE LCC tool to develop the worse case results based on their choice of inputs
* Our support for federal furnace standards aligns PG&E with the CPUC and CEC climate goals and efficiency objectives
* A more public position is an opportunity for PG&E to demonstrate greater environmental leadership