

A WARE PRODUCTIONS INC.

1001 E. 162nd Street, South Holland, IL 60473

NOPR for Energy Conservation Standards for Residential Furnaces
Docket No: EERE-2014-BT-STD-0031
RIN: 1904-AD20

April 15, 2015

The Honorable David T. Danielson
Assistant Secretary
U.S. Department of Energy
Energy Efficiency and Renewable Energy
1000 Independence Avenue SW
Washington, DC 20585

Dear Assistant Secretary Danielson:

I am writing to provide comment on the proposed energy standard impacting natural gas residential furnaces. I work on a regular basis as a civic leader in my community to stem the rise of violence and its causes. Also of importance to my comment is I worked as a general contractor for several years, and have first hand knowledge of how the proposed rule would adversely impact persons in low to moderate-income communities, particularly those in minority communities.

Most everyone agrees that energy efficiency is a good thing, but energy efficiency programs are supposed to help people in our communities save money on their monthly bills, not make them pay more. I firmly believe that the proposed rule will force individuals with limited resources to pay large amounts for a condensing natural gas furnace, or install a less expensive, but less efficient non-natural gas system. Families in our communities will pay more in the winter months to heat their homes, using systems that are less efficient. In short, this new standard will cost these communities more, and not save them more.

In Illinois and neighboring states, electric furnaces have higher costs than natural gas furnaces, costing an average of \$1300 more in annual operating costs. We are fortunate in Chicago to have lower than average natural gas costs (\$0.862 per therm to \$1.036 per therm).

At the end of the day, families in low-income communities will have more of their monthly income go toward heating cost.

This will hold true for both homeowners and renters. Landlords will also avoid the expensive retrofit and installation costs of condensing natural gas furnaces. They will use a system less expensive to install but more expensive to operate, with the expensive operating costs being left in the hands of the tenant.

The Department of Energy should delay implementing this proposal until such time that the adverse impact on low-income and minority communities can be avoided. Our communities have often suffered from bad environmental policy, and higher levels of pollution. It is ironic that this proposed rule will raise both economic and environmental costs, in communities least able to afford either.

Thank you for your consideration.

Sincerely,



Wayne Ware
President
A Ware Productions