



# AMERICAN PUBLIC GAS ASSOCIATION

## **APGA's comments on ASHRAE's proposed addendum *be* to standard 189.1 – 2011.**

The American Public Gas Association (APGA) is pleased to submit comments in response to ASHRAE's proposed addendum *be* to standard 189.1 – 2011 (first public review).

APGA is the national association for publicly-owned natural gas distribution systems. There are approximately 1,000 public gas systems in 37 states and over 700 of these systems are APGA members. Publicly-owned gas systems are not-for-profit, retail distribution entities owned by, and accountable to, the citizens they serve. They include municipal gas distribution systems, public utility districts, county districts, and other public agencies that have natural gas distribution facilities. For more information, please visit [www.apga.org](http://www.apga.org).

It is the position of APGA that the entire premise for the proposal is inconsistent with sound scientific principals and lacks the necessary supporting documentation. The air pollutant emissions identified in the Forward are not documented or referenced in terms of concentrations or specific effects on the indoor environment or human health. Language within the Forward acknowledges the fact the use of these appliances will not exceed ASHRAE's own standards. Instead, the proposal focuses on the perceived cumulative negative environmental impact. The proposal does not address the environmental benefits associated with virtual 100% thermal efficiency of these appliances and the reduced need for central heating. Unvented natural gas equipment reduces the overall energy demand as well as the total air emissions when compared to less efficient heating approaches. In addition to a lower environmental impact, natural gas appliances have a higher efficiency level on a source to site basis and are less expensive over time for consumers to operate.

The proposed standard will place natural gas appliances at a significant disadvantage. Natural gas competes with other energy sources, primarily electricity and fuel oil. These fuel sources are far less efficient and generate greater levels of greenhouse emissions on a full fuel cycle basis than natural gas. APGA contends that the proposal, despite being intended to promote energy efficiency, would ultimately undermine energy efficiency goals. Natural gas appliances are much more efficient than electric appliances on a full fuel cycle basis. According to the U.S. Energy Information Agency, the current national generation, transmission and distribution efficiency for electricity is 29.3% efficient, while the transmission and distribution of natural gas directly to the consumer is 90.1% efficient.

As currently drafted, the proposal would preclude older buildings from being retrofitted and meeting these requirements. The proposal as drafted would preclude a number of urban areas having large numbers of;

1. Older row homes and structures where venting is either not feasible or can only be performed at significant cost,
2. A significant percentage of rental units,

The reasoning for banning unvented combustion heating appliances provided in the Forward does not provide any technical justification for doing so in terms of environmental criteria consistent with a "green" standard. The proposal ignores important design and product standardization considerations, which have justified their continued use. From an environmental standpoint, it has been proven by countless scientific studies that the direct-use of natural gas is more energy efficient when compared to its electrical counterpart. If the goal of ASHRAE 189.1 is to achieve higher levels of indoor environmental quality performance and enhanced energy efficiency, then ASHRAE should continue to promote the use of unvented appliances as long as they are installed in accordance with manufacturer instructions (ASHRAE Standard 62.1).

APGA thanks you in advance for your consideration of these comments.