



# AMERICAN PUBLIC GAS ASSOCIATION

November 7<sup>th</sup>, 2017

The Honorable Greg Walden and Fred Upton  
House Committee on Energy and Commerce  
Subcommittee on Energy and Power  
2125 Rayburn House Office Building  
Washington, D.C. 20515

**Subject: Comments for Hearing on the Energy Star Reform Act of 2017 and H.R. 3477,  
Ceiling Fan Energy Conservation Harmonization Act**

Dear Chairman Upton, Representative Walden and Members of the Subcommittee on Energy and Power:

On behalf of our 730 members, the American Public Gas Association (APGA) appreciates this opportunity to submit comments for the record on the Energy Star Reform Act of 2017 Discussion Draft.

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 730 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 own and operate natural gas distribution facilities in their communities.

The primary focus of public gas systems is to provide safe, reliable, and affordable service to their customers and communities. Our members serve homeowners and small businesses that rely on affordable natural gas to heat their homes, cook their meals, and power their restaurants, schools, hospitals and businesses.

Because public gas systems are so tightly ingrained in the community, it is our responsibility to ensure we offer our communities the highest level of service at the lowest possible price. A key path to successfully lowering our constituents' energy bill is by promoting the most efficient equipment through programs like Energy Star. Energy Star enjoys significant market recognition and is considered the benchmark for energy efficiency. Because of the expertise and acceptance of the program, APGA believes that the Committee should consider requiring the establishment of an Energy Star Standard for all equipment before the Department of Energy considers mandating or revising minimum efficiency standards.

Clearly, the Energy Star Program is one of the most successful energy efficiency programs to date and it is our opinion that this success is based on the fact that it is a voluntary program focused on saving consumers money on their energy bill. This program, as well as other energy efficiency programs, becomes less effective when the focus is diverted away from achieving energy savings for consumers and replaced with the pursuit of broader environmental aspirations. It is critical that any agency involved in developing and promoting the Energy Star Program focus on furthering energy efficiency and the economic benefits that provides to consumers.

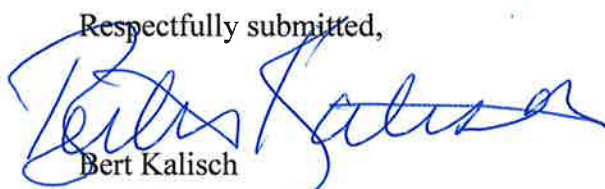
Because the Energy Star Program is based on partnerships between the federal government, manufacturers and utilities, it is imperative that the program's standards be developed through an open and transparent process. It is in the best interest of all to ensure that the public and interested stakeholders are given the necessary protections to allow for full participation in the process.

We would also recommend expanding the use of the primary energy matrix. Currently, the primary energy matrix is being used in the Energy Star Commercial Buildings Program and the Portfolio Manager tool. The inclusion of this form of energy accounting methodology gives both the consumer and policy makers a more accurate analysis of the overall energy savings. For example, by including the use of primary energy numbers in the appliance program, the consumer would be able to fully compare equipment, understand the appliance's true energy use and its cost to operate. The inclusion of an appliance's actual "energy footprint" will give the consumer another vital piece of data to help make a smart purchasing decision.

Finally, we commend the authors of the Energy Star Reform Act of 2017 for recommending that the Energy Star Program be inclusive of all equipment. We believe it is critical that all types and sizes of equipment are eligible for an Energy Star standard. Given that the Energy Star Program enjoys a high level of recognition by consumers APGA sees this as an important opportunity to ensure that manufactures are able to offer the consumer a wide range Energy Star products.

APGA appreciates the Committee's attention, interest and commitment to ensuring and improving the Energy Star Program. If any members of the Committee or their staff have any follow up or questions, please don't hesitate to contact me.

Respectfully submitted,



Bert Kalisch  
President