



## AMERICAN PUBLIC GAS ASSOCIATION

June 4, 2020

Dr. Stephanie Johnson  
U.S. Department of Energy  
Office of Energy Efficiency and Renewable Energy  
Building Technologies Office, EE-5B  
1000 Independence Avenue SW  
Washington, DC 20585-0121

Submission via [regulations.gov](https://www.regulations.gov)

**Re: Support for the Air-Conditioning, Heating, and Refrigeration Institute Response to Office of Energy Efficiency and Renewable Energy Request for Information Pertaining to Test Procedure for Commercial Warm Air Furnaces [Docket Number EERE-2019-BT-TP-0041]**

Dear Dr. Johnson:

The American Public Gas Association (APGA) appreciates the opportunity to provide comments in response to the Office of Energy Efficiency and Renewable Energy's request for information pertaining to test procedure for commercial warm air furnaces (CWAfS).

APGA is the trade association for approximately 1,000 communities across the U.S. that own and operate their retail natural gas distribution entities. They include municipal gas distribution systems, public utility districts, county districts, and other public agencies, all locally accountable to the citizens they serve. Public gas systems focus on providing safe, reliable, and affordable energy to their customers and support their communities by delivering fuel to be used for cooking, clothes drying, and space and water heating, as well as for various commercial and industrial applications.

Although not appliance manufacturers, APGA members do provide the energy needed to fuel CWAfS and, therefore, are critical stakeholders in any regulatory activity impacting them. APGA has worked for many years with the industry stakeholder, the Air-Conditioning, Heating, and Refrigeration Institute (AHRI), and in this proceeding, would like to echo the comments they have submitted. Their valuable work (and anticipated subsequent follow-up) will inform the Office of Energy Efficiency and Renewable Energy as it considers potential updates to CWAfS test procedures.

Thank you for your review and consideration of these comments, and if you have any questions regarding this submission, please do not hesitate to contact me.

Respectfully submitted,

A handwritten signature in blue ink that reads "Paul Schryver". The signature is written in a cursive style with a large initial "P" and "S".

Dave Schryver  
President & CEO  
American Public Gas Association