



## AMERICAN PUBLIC GAS ASSOCIATION

May 16, 2023

The Honorable Cathy McMorris-Rodgers  
Chair, House Energy and Commerce Committee  
2125 Rayburn House Office Building  
Washington, DC 20515

The Honorable Jeff Duncan  
Chair, House Energy and Commerce Committee  
Subcommittee on Energy, Climate, and Grid Security  
2125 Rayburn House Office Building  
Washington, DC 20515

The Honorable Frank Pallone  
Ranking Member, House Energy and Commerce Committee  
2125 Rayburn House Office Building  
Washington, DC 20515

The Honorable Diana DeGette  
Ranking Member, House Energy and Commerce Committee  
Subcommittee on Energy, Climate, and Grid Security  
2125 Rayburn House Office Building  
Washington, DC 20515

**Re: May 16<sup>th</sup> Subcommittee on Energy, Climate, and Grid Security Markup**

Dear Chairs McMorris-Rodgers and Duncan and Ranking Members Pallone and DeGette,

The American Public Gas Association (“APGA”) is the trade association representing more than 730 communities across the U.S. that own and operate their retail natural gas distribution entities. These include not-for-profit gas distribution systems owned by municipalities and other local government entities, all accountable to the citizens they serve. Public gas systems focus on providing efficient, 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.<sup>1</sup>

APGA’s members are critical stakeholders in getting the needed efficient, affordable, and reliable energy to American homes, and we write in support of H.R. 1640, the “Save Our Gas Stoves Act.” This critical legislation would ensure consumers are free to choose what cooking product they prefer in their homes

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<sup>1</sup> More information available at [www.apga.org](http://www.apga.org).

that meets their needs, especially including energy affordability. The proposed “Energy Conservation Program: Energy Conservation Standards for Consumer Conventional Cooking Products” would eliminate or restrict cooking features that people enjoy such as shorter cook times, simmering burners, and continuous grates.<sup>2</sup> The “Save our Gas Stoves Act” prohibits such elimination.

Efficiency standards for many household appliances, including gas-fired cooking products, were established by Congress in the Energy Policy and Conservation Act of 1975, as amended (“EPCA” or “Act”), which also requires the Department of Energy (“DOE”) periodically review the standards to determine whether more stringent standards are warranted under the various criteria set forth in the statute.<sup>3</sup> Congress required that standards be “supported by substantial evidence,”<sup>4</sup> meaning evidence that “a reasonable mind might accept as adequate to support a conclusion.”<sup>5</sup> Any new or amended energy conservation standard must be designed to achieve the maximum improvement in energy efficiency that DOE determines is technologically feasible and economically justified.<sup>6</sup>

APGA understands the role Congress gave DOE to implement regulations that are intended to improve appliance energy efficiency, but it must do so in a practical manner. APGA believes that DOE has made significant analytical, technical, and legal errors in the proposal. If the regulators are not going to make corrections, Congress must engage. APGA asks for achievable standards that promote energy efficient appliance standards without encouraging fuel switching. Unfortunately, DOE has failed to do so in the proposed “Energy Conservation Program: Energy Conservation Standards for Consumer Conventional Cooking Products.”

As not-for-profits, APGA member utilities strive to provide dependable natural gas service at the lowest cost possible. Rates are set by local utility boards or city councils who share the utility’s focus on providing reliable, affordable energy to their communities, not creating profits for shareholders or investors. The typical natural gas single-family home with standard efficiency appliances costs less than other fuel sources at just \$1,068 per year. Even compared to a home with a cold climate heat pump, the natural gas home on average saved \$390.<sup>7</sup> Nearly 180 million people and more than 5 million businesses in the U.S. rely on natural gas. Policy driven electrification will not only result in utility bill increases; it will also force consumers to shoulder the cost of replacing the appliances and equipment they use to heat their homes, cook, and dry clothes.

Families and businesses depend on the energy APGA members provide. The natural gas distribution system has proven to be more resilient and reliable than the outage-prone electric grid. Pipeline infrastructure is underground, looped, and shielded from many types of disruptions that can lead to power outages. When the power goes out, natural gas directly delivered to homes can still provide fuel for heat and the ability to cook and boil water.

APGA encourages the swift passage of this bill and looks forward to working with the Committee in

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<sup>2</sup> 88 Fed. Reg. 6818 (Feb. 1, 2023).

<sup>3</sup> 42 U.S.C. § 6295(f).

<sup>4</sup> 42 U.S.C. § 6306(b).

<sup>5</sup> *Consolo v. Fed. Maritime Comm’n*, 383 U.S. 607, 619-20 (1966); *NRDC v. Herrington*, 768 F.2d 1355, 1422 (D.C. Cir. 1985).

<sup>6</sup> 42 U.S.C. 6295(o)(2)(A).

<sup>7</sup> “Energy Insights: Comparison of Home Appliance Energy Use, Operating Costs, and Carbon Dioxide Emissions.” (<https://www.aga.org/research-policy/resource-library/energy-insights-comparison-of-home-appliance-energy-use-operating-costs-and-carbon-dioxide-emissions/>).

support of this legislation.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Stuart Saulters". The signature is fluid and cursive, with a prominent initial "S" and a long, sweeping tail.

Stuart Saulters

Vice President of Government Relations  
American Public Gas Association