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**APGA Expresses Concern about DOE's Latest Energy-Conservation
Standards for Commercial Water Heaters**

Washington, D.C. (May 5, 2022) – The American Public Gas Association (APGA), representing more than 730 local, municipally-owned natural gas systems in 38 states, issued the following statement in response to the Department of Energy's (DOE) proposed energy-conservation standards for commercial water heaters:

"APGA is disappointed in DOE's decision to set a condensing-only standard that disregards the important differences between condensing and non-condensing commercial water heating equipment. If finalized, this proposal would require schools, hospitals and small businesses that currently utilize non-condensing technology to undergo expensive retrofits when replacing commercial water heating equipment.

The replacement of non-condensing commercial water heaters with condensing alternatives would ultimately undermine efficiency goals while significantly increasing consumer costs. APGA and its members are strong proponents of energy efficiency standards that are rooted in sound science, transparent analyses and economic justification — all of which save Americans money and minimize emissions without threatening to eliminate consumer energy choice.

Changes such as this to appliance efficiency standards can undermine natural gas utilities' efforts to reduce greenhouse gas emissions and lower consumer costs. Further, the proposed rule will likely lead to fuel switching, despite the direct use of natural gas being roughly three times more efficient from point of extraction to point of use than electricity generated by natural gas.

APGA members remain steadfast in their commitment to serving their communities with safe, affordable and reliable natural gas, and will continue to advocate for policies that protect consumer choice."