



October 28, 2016

Mr. John Cymbalsky
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

RE: Supplemental Request of AGA and APGA for an Extension of the Comment Period
Supplemental Notice of Proposed Rulemaking (SNOPR) – Energy Conservation Standards for Residential
Furnaces – Docket No. EERE-2014-STD-0031

Dear Mr. Cymbalsky:

On September 26, 2016, the American Gas Association (“AGA”) and the American Public Gas Association (“APGA”) (collectively, the “Associations”) filed a joint supplemental request with the Department of Energy (“Department”) for an extension of time for filing comments on the Supplemental Notice of Proposed Rulemaking (“SNOPR”) on Energy Conservation Standards for Residential Furnaces for a total of a ninety (90)-day comment period from the date of publication of the SNOPR in the *Federal Register*.

The SNOPR was published in the *Federal Register* on September 23, 2016 (81 Fed. Reg. 65720), providing for a 60-day comment period, with comments due on or before November 22, 2016. Today, Spire Inc. (Spire) filed a request for a comment period extension to total a period of one hundred twenty (120) days from the date of publication of the SNOPR in the *Federal Register*. The Associations support this extension request.

Spire notes that, pursuant to the settlement agreement in APGA v. DOE, the Department agreed to provide a minimum of ninety (90) days for public comment following the issuance of the proposed rule; however, as Spire points out, that would make comments due just before Christmas, thus making a 120 day period more reasonable for all stakeholders.

The Associations agree with Spire that the supplemental extension requests are based on legitimate need. Due to the serious technical concerns with respect to the underlying methodology and associated proposed standards in the SNOPR, the Associations have retained the Gas Technology Institute (GTI) to conduct a thorough review of the SNOPR and related Technical Support Documents. While GTI began its review and analysis of the materials at as rapid a pace as possible under the tight time constraints in this docket, due to the immensity and complexity of the effort, GTI likely will not be able to complete all of the work we have requested before the end of the current comment deadline. GTI’s analysis of the methodology and the Associations’ ability to review the analysis and draft meaningful comments thereafter strongly support the Department’s granting of the request for a 120 day comment period.

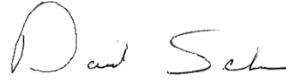
For the reasons set forth in their September 26 request and herein, the Associations support Spire and request that the Department issue a decision in writing within seven (7) days of this request to extend the comment period deadline for all interested parties in this proceeding to a date that is 120 days from the September 23 *Federal Register* publication, to a comment deadline of Monday, January 23, 2017.

Thank you for your prompt consideration of this request.

Respectfully submitted,



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