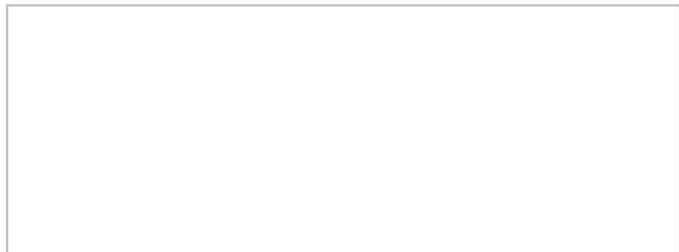


**RELEASE: AGA Files Comments on DOE NODA**

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## AGA Files Comments on DOE NODA

*Washington, D.C.* – AGA has filed [comments](#) on the Department of Energy (DOE) Notification of Data Availability and Request for Comment (NODA): “Energy Conservation Program: Energy Conservation Standards for Consumer Conventional Cooking Products” in conjunction with Spire and the American Public Gas Association (APGA) and the National Propane Gas Association (NPGA).

DOE has attempted to revise the considerable errors in DOE’s proposed standard for gas cooktops, but its approach would harm consumers while doing little to reduce energy or costs. DOE’s revised “efficiency levels” would eliminate entire classes of gas stoves and remove features consumers need when they cook, and would only achieve an average savings of 4 to 8 cents per month, according to DOE data. More than a third of consumers would see a net cost increase if DOE set a standard at the highest proposed efficiency level. Alleged cost saving measures that increase costs to consumers more than they save are counterproductive and are not economically justified.

“AGA and our members have consistently supported energy conservation standards that are technologically feasible and economically justified. In this case, DOE’s flawed approach and analysis is compounded by the fact that DOE has not proposed new standards or indicated whether these revised efficiency levels would be justified. DOE’s lack of transparency and clarity means stakeholders cannot provide meaningful comment,” said Karen Harbert, AGA president and CEO. “However, taking DOE’s analysis at face value, DOE’s actions are clearly not economically justified and increase costs to customers. DOE’s highest proposed efficiency level results in a net cost to consumers between \$20 million and \$90 million over thirty years with little to no reduction in energy use. Implementing DOE’s new higher efficiency level will eliminate at least 59 percent of gas cooktops currently on the market. DOE should rescind its proposed rule or determine that new standards are not justified.”

The comments reference numerous issues with the NODA. One such issue is the alarming lack of transparency by DOE: “In short, in response to a request for clarity about what DOE is proposing in this proceeding, DOE’s response was that it may choose an efficiency level higher or lower than what was proposed or a mix thereof.” DOE’s hide-the-ball approach deprives the public from providing adequate feedback and comments on the rulemaking.

Another issue raised by the comments is the danger that the higher standard proposed risks effectively outlawing certain types of gas stoves. DOE's data shows that – of 55 tested products with continuous cast iron grates and high-capacity burners – only one product with “multiple” high-capacity burners can meet the new higher efficiency level.

The numerous issues identified by AGA and our partner organizations can be accessed in the full comments, available [here](#).

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**About the [American Gas Association](#)**

The American Gas Association, founded in 1918, represents more than 200 local energy companies that deliver clean natural gas throughout the United States. There are more than 77 million residential, commercial and industrial natural gas customers in the U.S., of which 96 percent — more than 74 million customers — receive their gas from AGA members. Today, natural gas meets nearly one-third of the United States' energy needs.