

Advocacy Comments on DOE’s “Energy Conservation Standards for Commercial Warm Air Furnaces”

On April 3, 2015, the Office of Advocacy (Advocacy) filed public comments with the Department of Energy (DOE) in response to the proposed rule “Energy Conservation Standards for Commercial Warm Air Furnaces”.

- On February 4, 2015, DOE issued “Energy Conservation Standards for Commercial Warm Air Furnaces” soliciting comments on the proposed rule.
- The proposed rule will have a significant economic impact on the sole small manufacturer of gas-fired commercial warm air furnaces identified by DOE.
- DOE has estimated conversion costs at \$4.4 million per manufacturer. The affected small business is concerned that the proposed standards are not economically feasible to comply within the three-year period prescribed by DOE.
- The small manufacturer has only seven percent of the gas-fired commercial warm air furnace listings in the market, so their compliance with the proposed standard would yield little in the way of energy savings, but cause significant economic harm to that small business.
- Advocacy recommends that DOE use its discretion to adopt an alternative to the proposed standard that is achievable for small manufacturers of gas-fired commercial warm air furnaces.

For more information, visit Advocacy’s website at <http://www.sba.gov/advocacy> or contact Rosalyn Steward at 202-205-7013.