



Secretary Chris Wright  
U.S. Department of Energy  
Office of Energy Efficiency and Renewable Energy  
1000 Independence Avenue, NW  
Washington, DC 20585

Re: Petition for Rulemaking for Commercial Water Heating Equipment and Consumer Furnaces (Docket No. EERE-2026-BT-STD-0001)

Dear Secretary Wright:

The undersigned national health and medical organizations strongly urge the Department of Energy (DOE) to deny the petition submitted by the American Gas Association (AGA), American Public Gas Association (APGA) and National Propane Gas Association (NPGA) requesting that DOE delay compliance dates for commercial water heaters and residential furnace efficiency standards until 2030.

### **Prolonged Harm to Public Health**

Delaying these compliance deadlines would harm public health by prolonging the use of less efficient, more polluting appliances that contribute to unhealthy indoor and outdoor air pollution. Residential furnaces and commercial water heaters that rely on fossil fuel combustion contribute to emissions of harmful pollutants including nitrogen oxides and particulate matter, which contribute to poor indoor air quality and worsen outdoor smog and particle pollution.<sup>1</sup> Exposure to these pollutants is linked to asthma attacks,

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<sup>1</sup> [The Health Impact of Combustion in Homes](#)

respiratory illness, cardiovascular disease, adverse pregnancy outcomes and even premature death. Particle pollution exposure can also contribute to lung cancer.<sup>2</sup> Indoor exposure to nitrogen dioxide from gas appliances can exacerbate asthma symptoms and wheeze in children and may increase lower respiratory tract illnesses and reduce lung function in children.<sup>3</sup> Along with children, older adults and people with preexisting conditions face the greatest risks from continued emissions. Leading health and medical organizations strongly supported these standards due to the immense health benefits they would provide to patients, households and communities.<sup>4,5</sup>

### **Protecting Consumers from Higher Energy Costs**

The standards finalized in 2024 will help reduce these harmful emissions while also reducing energy waste and lowering costs for consumers and businesses over time. They don't impose requirements on homeowners or renters; rather, they ensure that new appliances are healthier and more efficient. Delaying implementation would postpone these important health and economic benefits for millions of households and commercial building operators across the country. DOE finalized these standards following extensive technical analysis, stakeholder engagement from industry, health and energy experts and public process. Leading U.S. water heater manufacturers were involved in decision-making, ensuring the standards were achievable.<sup>6</sup>

Our organizations represent patients and public health and health care professionals, for whom air pollution from fuel-burning appliances is a significant health concern. Our long-time advocacy in support of standards to make appliances in homes healthier and more efficient has highlighted the health benefits of protecting families from indoor and outdoor air pollution. We also note that there are additional benefits to households of these policies. At a time when families and businesses are already facing rising costs - including increased energy prices and healthcare expenses - delaying the standards would weaken policies designed to help consumers and businesses access more affordable, efficient, less-polluting appliances and energy sources. More efficient appliances can help reduce financial pressures while improving public health outcomes.

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<sup>2</sup> [Particle Pollution | American Lung Association](#)

<sup>3</sup> [Meta-analysis of the effects of indoor nitrogen dioxide and gas cooking on asthma and wheeze in children - PubMed](#)

<sup>4</sup> [water-heater-DOE-comments.pdf](#)

<sup>5</sup> [Coalition Letter on DOE Gas Furnace Rule](#)

<sup>6</sup> [DOE Finalizes Efficiency Standards for Water Heaters to Save Americans Over \\$7 Billion on Household Utility Bills Annually | Department of Energy](#)

## **Preserving Regulatory Certainty**

The requested delay would also undermine regulatory certainty and conflict with DOE's statutory obligations under the Energy Policy and Conservation Act. While we appreciate the opportunity to comment on this petition, we also caution the Department that granting requests to delay finalized standards without sufficient justification risks disrupting planning and investment for those working to expand access to cleaner, more efficient appliances.

On behalf of the patients and communities we serve and individuals across the country, we urge DOE to deny the petition and maintain the current compliance timelines for commercial water heaters and residential furnace standards. Implementing these standards without delay is critical to protecting public health, reducing harmful pollution, lowering energy costs and supporting healthier homes and communities nationwide.

Sincerely,

Alliance of Nurses for Healthy Environments

American College of Chest Physicians

American Lung Association

American Public Health Association

International Society of Environmental Epidemiology – North America Chapter

Medical Society Consortium on Climate and Health

Medical Students for a Sustainable Future

National Association of Pediatric Nurse Practitioners

Oncology Advocates United for Climate and Health – International

Physicians for Social Responsibility