



NCELE

National Caucus of  
Environmental Legislators

September 26, 2023

Honorable Jennifer Granholm  
Secretary  
U.S. Department of Energy  
1000 Independence Ave., SW  
Washington, DC 20585

**Re: Docket Number EERE–2017–BT–STD–0019**

Dear Secretary Granholm:

As state legislators with environmental priorities, we are writing in support of the Department of Energy’s proposal to increase the efficiency levels of both electric, gas-fired, and oil-fired consumer water heaters. Outdated, inefficient water heaters generate high energy bills that particularly burden lower-income households and emit millions of tons of avoidable climate emissions and other pollutants that harm both the environment and human health. We agree with the agency’s findings that adopting this proposed rule would simultaneously save consumers money on their monthly energy bills while also benefiting the planet and human health by reducing greenhouse gas emissions and other dangerous pollutants.

The adoption of strong appliance and equipment standards is integral to the United States achieving its climate goals. The Appliance Standards Awareness Project’s report, *A Powerful Priority*, demonstrates how updating standards for 47 products could cut cumulative carbon dioxide emissions by 1.5-2.9 billion metric tons by 2050.<sup>1</sup> Of these products, water heaters represent the largest potential for emissions reductions. Given the administration’s goals around decarbonization and achieving a net-zero economy by 2050, it is crucial to prioritize the completion of these efficiency standards.

The proposed standards would reduce carbon dioxide emissions by more than 500 million metric tons over 30 years of sales, helping put us on track to meet U.S. climate goals. They would also reduce emissions of nitrogen oxides—which cause asthma attacks, cardiovascular disease, and even premature death—by 988,000 tons, and avert 4,541 thousand tons of methane emissions as well.

Water heating bills are one of the biggest energy expenses for most households—thus, increasing water heaters efficiency would go a long way towards easing energy burdens. The proposed standards would reduce energy bills for households with electric storage water heaters by \$238 per year on average relative to the current standards; for gas storage and gas instantaneous water heaters, consumers would save \$19 and \$22 per year, respectively. These bill savings would particularly benefit low-income households, which spend three times more of their income on energy costs compared to non-low-income households. DOE estimates that for low-income households affected by the proposed standard for electric storage water heaters, the cost of improved efficiency would pay back in lower bills within 1.3 years on average.

As state legislators, we work daily to ensure the public health, economic well-being, and future of our constituents. We urge DOE to swiftly finalize this proposed rule for consumer water heaters that would significantly reduce greenhouse gas emissions and other pollutants that harm both our planet and human health, while simultaneously providing substantial utility bill savings for U.S. consumers. Thank you for considering this input.

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<sup>1</sup> Mauer, J., and A. deLaski. 2020. *A Powerful Priority: How Appliance Standards Can Help Meet U.S. Climate Goals and Save Consumers Money*. Washington, DC: ACEEE; Boston: ASAP.

Signed,

Nevada Assembly Member Howard Watts  
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(AK-13)

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