

June 6, 2023

The Honorable Debbie Lesko
U.S. House of Representatives
1214 Longworth House Office Building
Washington, DC 20515

Dear Representative Lesko –

On behalf of the National Propane Gas Association, thank you for introducing the *Save Our Gas Stoves Act*, which pushes back against recent the Department of Energy (DOE) supplemental notice of proposed rulemaking (SNOPR), *Energy Conservation Program: Energy Conservation Standards for Consumer Conventional Cooking Products*,¹ that would limit the availability of gas stoves, threaten consumer choice, and will result in costly fuel switching.

NPGA is the national trade association of the propane industry with a membership of about 2,400 members and 36 state and regional associations representing members in all 50 states. Membership in NPGA includes retail marketers of propane gas who deliver the fuel to the end user, propane producers, transporters and wholesalers, and manufacturers and distributors of equipment, containers, and appliances. Propane gas fuels millions of installations nationwide for home and commercial heating and cooking, in agriculture, industrial processing, and as a clean air alternative engine fuel for both over-the-road vehicles and industrial lift trucks. Roughly 75% of NPGA's members have fewer than 100 employees and are considered small businesses.

In February, DOE released the SNOPR, in which the agency proposed new and amended energy conservation standards for consumer conventional cooking products² that would make 96% of the gas cooktops in the market out of compliance by 2027.³ In fact, only one gas stove that DOE tested met this new standard.⁴ Coincidentally, 100% of the electric (open) coil element cooktops and 80% of the electric cooktops would meet or exceed these new standards.⁵ The SNOPR's proposed standards not only encourage fuel switching, but given conversion costs,⁶ may compel fuel switching for consumers by the elimination of gas stoves in the market. This compelled fuel switching and elimination of consumer choice are anticompetitive in nature and contrary to EPCA. Additionally, the SNOPR has significant anticompetitive effects on small businesses that exclusively produce gas cooktops.

¹ Energy Conservation Program: Energy Conservation Standards for Consumer Conventional Cooking Products: Supplemental Notice of Proposed Rulemaking and Announcement of Public Meeting, 88 Fed. Reg. 6818 (Feb. 1, 2023).

² *Id.*

³ SNOPR at 6857.

⁴ TSD at 5-33.

⁵ *Id.*

⁶ SNOPR at 6898.

Because of the effects of this proposed rulemaking, and numerous other recent DOE regulatory actions, NPGA supports this legislation, and any effort, that provides reasonable protections for consumers to choose their preferred fuel and home appliances. Thank you again for introducing this critical legislation, and we look forward to working with you throughout the 118th Congress.

Sincerely,

A handwritten signature in black ink, appearing to read 'Stephen T. Kaminski', with a long horizontal flourish extending to the right.

Stephen T. Kaminski
President and Chief Executive Officer
National Propane Gas Association