



August 21, 2026

Administrator Chris Wright  
U.S. Department of Energy  
1000 Independence Avenue SW  
Washington, DC 20585

**Re; Docket ID [EERE-2025-BT-STD-0001]: “Procedures, Interpretations, and Policies for Consideration of New or Revised Energy Conservation Standards and Test Procedures for Consumer Products and Certain Commercial/Industrial Equipment” (“Process Rule”)**

Dear Administrator Wright:

The undersigned national health and medical organizations oppose the proposed revisions to the Department of Energy’s (DOE) “Procedures, Interpretations, and Policies for Consideration of New or Revised Energy Conservation Standards and Test Procedures for Consumer Products and Certain Commercial/Industrial Equipment,” or “Process Rule.” The proposal would create unnecessary barriers to the timely development and implementation of appliance efficiency standards, delaying important public health benefits associated with more efficient technologies.

Appliance efficiency standards reduce energy consumption, thereby lowering emissions, which leads to improvements in air quality and community health. They help reduce fuel use in appliances that burn gas, propane or oil, which can include pollutants linked to asthma attacks, respiratory illness, cardiovascular disease and other serious health harms.<sup>1</sup> Appliance standards focus on manufacturer requirements rather than replacement obligations placed directly on individual residents. Delaying or making it more difficult to implement appliance efficiency standards would prolong American families' exposure to unhealthy air and undermine important public health protections, all while the technology already exists to improve efficiency, reduce costs and improve air quality.

Fuel-burning appliances and equipment, such as furnaces and water heaters, emit nitrogen dioxide (NO<sub>2</sub>), carbon monoxide, particulate matter and other harmful pollutants. These emissions contribute to ozone and particle pollution, worsening air quality and associated health risks in surrounding communities. According to the American Lung Association's "State of the Air" 2026 report, 152.3 million Americans are currently living in areas with unhealthy air, including nearly half of the nation's children, whose still-developing lungs make them particularly vulnerable to the impacts of air pollution. Others at heightened risk to the harmful effects of air pollution include people who are over 65, are pregnant or have underlying health conditions.<sup>2</sup> Because emissions from power plants and fuel-burning appliances contribute to the formation of ozone and fine particle pollution outdoors, appliance efficiency standards are an important tool for reducing the air pollution that continues to harm millions of Americans.

Strong efficiency standards help reduce the amount of energy needed to heat water, warm homes and power everyday appliances. Lower energy demand means less fossil fuel combustion, whether from sources such as power plants or end-use combustion in homes and businesses, resulting in lower emissions of smog-forming pollutants, particle pollution and hazardous air pollutants. Efficiency standards also provide significant consumer benefits by reducing energy waste and lowering utility bills.

At a time when families across the country are seeing their household finances stretched even further - whether by increased energy or healthcare costs - we oppose efforts that weaken policies aimed at allowing consumers to access more efficient appliances. The proposed revisions to the "Process Rule" would make it more difficult and time-consuming for DOE to establish or update efficiency standards, delaying these public health and economic benefits. Such delays would extend the use of less efficient, more polluting

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<sup>1</sup> [Impacts of Residential Combustion](#)

<sup>2</sup> [State of the Air | American Lung Association](#)

equipment for longer periods, increasing avoidable exposure to harmful air pollution and higher energy costs for households and institutions.

The proposed revisions are also inconsistent with the purposes and structure of the Energy Policy Conservation Act (EPCA). Congress directed DOE to establish and periodically strengthen energy conservation standards when doing so is technologically feasible, economically justified and results in significant energy savings. The proposed “Process Rule” updates would impose additional procedural and analytical hurdles that are not required by EPCA and could unnecessarily delay or impede the adoption of standards that satisfy the statute’s criteria. As a result, the proposal could delay the energy savings, cleaner air and public health protections that Congress intended the appliance standards program to provide.

For these reasons, we urge the Department of Energy to withdraw the proposed revisions to the “Process Rule” and preserve a process that supports the timely development and implementation of strong appliance efficiency standards that protect public health, reduce harmful air pollution and lower energy costs.

Sincerely,

Alliance of Nurses for Healthy Environments

American College of Physicians

American Lung Association

American Public Health Association

American Thoracic Society

Asthma and Allergy Foundation of America

Children's Environmental Health Network

International Society for Environmental Epidemiology - North America Chapter

Medical Students for a Sustainable Future

Medical Society Consortium on Climate and Health

National League for Nursing

Oncology Advocates United for Climate and Health – International

## Physicians for Social Responsibility