

# Greenhouse Gas Emissions

## Issue Overview

Concerns about the impacts of climate change have compelled policymakers to seek ways to cut greenhouse gas (GHG) emissions across all sectors of the U.S. economy. Although reducing emissions from transportation and electricity generation and upgrading the existing housing stock will yield higher reductions, several recently targeted efforts are aimed at buildings and the building industry. If implemented, they will add another layer of uncertainty and cost, impact home design choices and further undermine the ability of home builders to add to the nation's housing deficit.

For example, GHG emissions reporting, gas bans and electrification, calculating the social costs of carbon (SCC), and transitioning the types of refrigerants used in cooling equipment could all have significant impacts, yet yield minimal reductions.

## Solutions

- Rescind the Securities and Exchange Commission's March 2024 GHG reporting rules.
- Enact legislation to preserve consumer energy choice by disallowing any prohibition on natural gas or any other fuel source.
- Initiate a new DOE rulemaking process to rescind the December 2023 DOE final rule (Docket No. EERE-2014-BT-STD-0031) updating energy efficiency standards for residential gas furnaces.. Consider modifying the underlying statute to separate requirements for new and existing buildings and potentially by climate zone.
- Initiate a new DOE rulemaking process to rescind the April 2024 DOE final rule (Docket No. EERE-2017-BT-STD-0019) updating energy efficiency standards for residential consumer water heaters (including electric and gas-fired storage tank water heaters) and the December 2024 final rule concerning tankless hot water heaters..
- Suspend actions by EPA and DOE requiring the transition to A3 refrigerants.
- Pass legislation that prohibits the use of SCC in regulations.
- Rescind/revise regulations and guidance issued by the White House, EPA, DOE and others on the use of SCC in cost-benefit analyses, including removing SCC from EPA and DOE methodologies for analyzing individual products or systems used in construction.
- Work with the Office of Information and Regulatory Affairs (OIRA) to establish guidelines for cost-benefit analysis that limit the use of SCC to situations where it does not limit market choice in achieving emission reduction goals.