



June 25, 2007

Rachel Schmeltz
ENERGY STAR Product Manager
U.S. Environmental Protection Agency
Office of Air and Radiation
Ariel Rios Building 6202J
1200 Pennsylvania Avenue NW
Washington, DC 20460

Dear Ms. Schmeltz:

The Consortium for Energy Efficiency (CEE) appreciates the opportunity to provide comments on draft Version 2.1 of the ENERGY STAR specification for residential furnaces. These comments were developed by CEE's Natural Gas Committee and are supported by the organizations listed below. We are commenting on the proposed changes to a requirement of 92% AFUE performance.

CEE supports the 92% AFUE rating for natural gas furnaces provided this level is consistent with the ENERGY STAR guiding principles.¹

CEE applauds U.S. EPA efforts to increase the ENERGY STAR for residential furnaces performance requirements. In general, we view increased efficiency specifications as a positive step toward advancing overall energy efficiency. However, we also attach importance to maintaining ENERGY STAR's usefulness as an indicator of cost-effective, energy-efficient options for North American consumers. To maintain brand reputation, we ask that U.S. EPA approach the adoption of furnace specifications in a way that is consistent with the use of the brand as identified in "ENERGY STAR Label: A Summary of Product Labeling Objectives and Guiding Principles." The principles of primary concern to us in this case are:

- "significant energy savings can be realized on a national basis," and
- "purchasers will recover their investment in increased energy efficiency within a reasonable period of time."

Many CEE members can support programs at 92% AFUE level, but at least one cannot. We request further cost-effectiveness analysis that supports this change and the opportunity to provide comment on it.

CEE urges U.S. EPA to work with manufacturers to develop a reporting method for the electrical consumption of furnace fan blowers.

¹ U.S. EPA, "ENERGY STAR Label: A Summary of Product Labeling Objectives and Guiding Principles," May 3, 2003, accessed online: http://www.energystar.gov/ia/partners/prod_development/downloads/guiding_princip.pdf



We urge U.S. EPA to continue to work toward developing a furnace fan efficiency requirement. The measure that CEE developed provides a measure of energy consumption by the furnace fan relative to the overall energy consumption of the furnace, and it is not necessarily appropriate for all regions. An absolute measure of fan efficiency would be of use to our members as well. We encourage U.S. EPA to seek a method for reporting the absolute electrical efficiency of furnace fans. Such reporting will provide a basis to create consumer value through differentiated offerings based on furnace fan efficiency and provide CEE members a way to understand the electrical energy consumption related to furnace fans. Ideally, the cost of such reporting should not be disproportionate to the savings provided. The reporting requirements recently adopted by Natural Resources Canada's Office of Energy Efficiency² may provide a useful starting point for discussion between U.S. EPA and manufacturers.

CEE looks forward to continuing to work with U.S. EPA on improving air handling efficiency and the overall efficiency of residential natural gas furnaces.

Thank you for your consideration of these comments. Please contact CEE Senior Program Manager Kara Rodgers at (617)-589-3949 ext. 202 or krodgers@cee1.org with any questions.

Sincerely,

A handwritten signature in black ink that reads "Marc J. Hoffman". The signature is written in a cursive, flowing style.

Marc Hoffman
Executive Director

Supporting Organizations

- Alliant Energy
- Aquila
- BC Hydro
- Berkshire Gas Company
- Energy Trust of Oregon
- KeySpan Energy Delivery
- Minnesota Department of Commerce
- Northeast Utilities
- NSTAR Electric & Gas
- NW Natural
- Pacific Gas & Electric Company
- Questar Gas Company
- Southern California Gas Company
- Terasen Gas
- Unitil Service Corp.
- Wisconsin Focus on Energy

²Proposed Regulations Bulletin: Gas-Fired Furnaces”, Amendment 10, March 2007, accessed online: <http://oee.nrcan.gc.ca/regulations/bulletin/gas-furnace-mar2007.cfm?text=N&printview=N>