



HRAI Manufacturers Division  
2800 Skymark Avenue, Building 1, Suite 201  
Mississauga, ON L4W 5A6  
Tel: (905) 602-4700 Toll Free: 1-800-267-2231 Fax: (905) 602-1197  
E-mail: [manuf@hrai.ca](mailto:manuf@hrai.ca) Website: [www.hrai.ca](http://www.hrai.ca)

June 21, 2007

Ms. Rebecca Duff  
ICF International

*Sent by e-mail*

**Subject: Proposed Eligibility Criteria for ENERGY STAR qualified Furnaces**

Dear Ms. Duff,

We are writing to you on behalf of the members of the Heating, Refrigeration and Air Conditioning Institute of Canada (HRAI) in response to the EPA's proposal on the eligibility criteria for ENERGY STAR qualified Furnaces.

HRAI furnace manufacturer members have reviewed the draft 1 version 2.1 product specification for ENERGY STAR qualified furnaces. Members support the Tier II levels of 92% AFUE for gas furnaces and 85% AFUE for oil furnaces effective October 1, 2008. We also agree that any fan efficiency requirements need to be delayed until such time an acceptable test procedure is in place and we have a clear understanding of the product availability. It is critical to manufacturers that a harmonized test procedure be adopted across North America.

Thank you for providing HRAI with the opportunity to comment on this specification.

Regards,

A handwritten signature in black ink, appearing to read "C. Czajko". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Caroline Czajko  
Manager

Cc: A. Wilkins, NRCan  
R. Jennings, Chair HAC Product Section  
W. Heeley, HRAI President