



June 29, 2007

Rebecca Duff, ICF International

Rachel Schmeltz, EPA

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RE: ENERGY STAR Program Requirements for Furnaces (Version 2.1 Draft 1)

Dear Ms Duff and Ms Schmeltz:

Rheem Manufacturing, a world-wide leader in the design and manufacturing of gas and oil fired furnaces offers the following comments to Version 2.1 – Draft 1 of the ENERGY STAR specification for furnaces:

- Rheem supports the proposal to raise the ENERGY STAR efficiency Tier II criteria for gas furnaces from 90% AFUE to 92% AFUE.
- Rheem supports the EPA's decision not to include furnace fan efficiency requirements in the ENERGY STAR efficiency criteria for both gas and oil furnaces
- Rheem does not support ENERGY STAR efficiency Tier II criteria for oil furnaces. This will eliminate Rheem's entire oil furnace line from Energy Star consideration. In addition, with the declining market demand for oil furnaces, few manufacturers are likely to spend the time and expense to redesign furnaces to meet this new specification.
- Rheem does not support the inclusion of a manufacture limited warranty as a requirement for ENERGY STAR. All responsible manufactures currently back their product via a limited warranty, and adding this as an ENERGY STAR requirement is redundant.

**Thank you the opportunity to provide these comments. If you have any questions or need additional information, please do not hesitate to contact me by email at [kmeyers@RheemAC.com](mailto:kmeyers@RheemAC.com) or by telephone at (479) 648-4747.**

Regards,

**RHEEM MANUFACTURING COMPANY**

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