



GAMA-An Association of Appliance & Equipment Manufacturers

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October 20, 2006

Product Divisions
and Groups

- Burner
- Controls
- Corrugated
Stainless Steel
Tubing
- Direct Fired
Heater
- Direct Heating
- Food Service
Equipment
- Fuel Cell
Furnace
- Gas Air
Conditioning
- Gas Appliance
Connector
- Gas Detector
- Gas Equipment
& Service
- Gas Venting
Products
- General Products
- Hydronics
Institute
- Industrial Forced-
Air Heating
- Infrared
- Motor & Blower
- Power
Generation
- Relief Valve
- Vent Free Gas
Products
- Water Heater

Ms. Rebecca Duff
ICF, International
Washington, DC

Subject: Proposed Final Draft of ENERGY STAR Program for Residential Furnaces

Dear Ms. Duff:

GAMA appreciates the opportunity to comment on the proposed final draft revisions to the ENERGY STAR Furnace specification included in the October 10, 2006 letter from the U.S. Environmental Protection Agency (EPA).

While GAMA continues to support EPA's efforts to increase the choices for consumers seeking the more efficient oil-fired furnace models, we do not support the introduction of the 85% AFUE Tier II requirement a mere one year after implementation of the Tier I requirement. The proposed effective date of Tier II requirements will not allow sufficient time to conduct an objective evaluation of the effect of Tier I requirements on the marketplace. Manufacturers require this information to enable them make strategic business decisions regarding the Tier II requirements. If manufacturers do decide to increase the numbers of models that they will offer that meet the Tier II level, the time to design, test, list, and modify the production process to produce a new 85% AFUE model can easily take a year or more. Thus, we respectfully request that EPA delay the effective date for Tier II requirements to October 2008.

While GAMA appreciates EPA's decision to consider the subject of Tier II furnace fan efficiency under an extended review process, we reaffirm our position that electrical consumption is not an appropriate ENERGY STAR criterion for gas and oil furnaces. As noted in our previous comments on this subject, we believe including an electrical requirement inappropriately shifts the focus from the much more significant gas or oil consumption to the very minor electricity consumption. As an alternative to proceeding with an electrical consumption criterion, we propose that the Tier II requirement for gas furnaces be raised to 92% AFUE. The amount of energy saved from this 2 point increase in AFUE would be more than the assumed benefit of a new electrical consumption criterion. GAMA would like to discuss this issue further with EPA and we hope you can attend a meeting with our members at a mutually agreeable date and time in the near future.

If you have any questions or need additional information, please do not hesitate to contact me by email at gpumpuni@gamanet.org or by telephone at (703) 525-7060 ext. 237.

Sincerely,

Gloria Pumpuni
Director, Technical Services & Regulatory Affairs

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