



GAMA-An Association of Appliance & Equipment Manufacturers

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Controls

Corrugated
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Tubing

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Heater

Direct Heating
Food Service
Equipment

Fuel Cell

Furnace

Gas Air
Conditioning

Gas Appliance
Connector

Gas Detector

Gas Equipment
& Service

Gas Venting
Products

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Hydronics
Institute

Industrial Forced-
Air Heating

Infrared

Motor & Blower

Power
Generation

Relief Valve

Vent Free Gas
Products

Water Heater

June 21, 2007

Ms. Rebecca Duff
ICF, International
Washington, DC

Subject: Proposed Draft 1 ENERGY STAR Version 2.1 Furnace Specification

Dear Ms. Duff:

GAMA appreciates the opportunity to comment on the proposed draft revisions to the ENERGY STAR Furnace specification included in the June 8, 2007 letter from the U.S. Environmental Protection Agency (EPA). Our comments to the proposed revisions are:

GAMA supports the proposal to raise the ENERGY STAR efficiency Tier II criteria for gas furnaces from 90% AFUE to 92% AFUE. This level helps EPA achieve the goals of the ENERGY STAR program without limiting the choices for consumers seeking the most efficient gas furnace models.

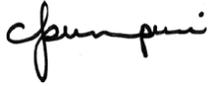
In the case of oil furnaces, we are concerned that the proposed 85% AFUE Tier II requirement which reduces the number of qualifying models to only 83 models (an 82% reduction in qualifying models), significantly limits the availability of models to consumers for installation in all configurations. Furthermore, as the number of installations of high efficiency oil-fired appliances continues to grow, the industry has recognized a need to develop and/or refine existing guidelines regarding the proper venting of high efficiency oil-fired appliances. To this end, an industry research program concerning the venting of high efficiency oil-fired appliances has been initiated. This program will focus on installations in existing venting systems such as masonry chimneys. The results of this study could have implications for oil furnaces at the 85% AFUE level. As such, we do not support the implementation of the proposed 85% AFUE Tier II requirement at this time, and urge the EPA to delay implementation of this requirement until after the findings of this research project are available.

Finally, GAMA appreciates EPA's recognition of the complexities surrounding the issue of furnace fan efficiency, and supports EPA's decision not to include Tier II furnace fan efficiency requirements in the ENERGY STAR efficiency criteria for both gas and oil furnaces. We reaffirm our position that electrical consumption is not an appropriate ENERGY STAR criterion for gas and oil furnaces and believe including an electrical requirement inappropriately shifts the focus from gas or oil consumption to electricity consumption. Recognizing however, that EPA intends to reconsider the feasibility of including furnace fan efficiency requirements in future versions of the specification, we will continue working with EPA in its effort to properly assess this matter.

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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,

A handwritten signature in black ink, appearing to read "G. Pumpuni". The signature is written in a cursive style with a large initial "G" and a long, sweeping underline.

Gloria Pumpuni
Director, Technical Services & Regulatory Affairs