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Jim Mullen
Director of Technology Services
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Ms. Rebecca Duff
ICF International

Re: Draft 1 Energy Star Version 2.0 Furnace Specification

Dear Ms. Duff:

Thank you for the opportunity to comment on the draft specifications referenced above regarding oil furnace efficiency and gas and oil furnace electrical requirements. Lennox supports the comments submitted by our Trade Association, GAMA, and we wish to emphasize the following points which we believe are of importance in your decision making process.

Title and Furnace Definition

While we agree it is appropriate to add a maximum Btuh input limit to the definitions, it should be 225,000 Btuh, rather than 340,000 Btuh. Only furnaces with input less than 225,000 Btuh are rated in AFUE per the ASHRAE 103 and 10 CFR 430 cited. The primary designator should be Btuh and if necessary, the equivalent KW should be a secondary specification. The furnace markings, GAMA directory listings and manufacturer's specifications employ the Btuh system of units.

Also, for clarification, we assume "residential furnaces " refers to where the furnace is installed as opposed to a unit designation. Most single phase furnaces can be installed in either commercial or residential installations, and as such are not marked "residential furnace". "Furnaces installed in residences" or "used in residences" might be a more appropriate terminology.

Minimum 83 AFUE for Oil

While we agree that for Energy Star to be useful for oil furnaces requires resetting the Energy Star level set less than 90 AFUE, we question whether 83 is the appropriate level. Setting the specification at 81 or 82 AFUE may be necessary to insure that all models and inputs are present in the market and that sufficient models are available for a competitive marketplace exists. If 83 does not meet the market needs, the specification may have the unintended consequence of encouraging "wongsizing" to fill the availability gaps with Energy Star qualified equipment. Simply counting directory listings and setting a 25% cutoff is an inadequate approach to ensuring success. Due to the large number of brand named products in the small oil furnace market, the 25% referenced might only be 8% to 16% if each model is sold under 2 or 3 brand names. A better analysis of the cutoff AFUE level, input sizes and configuration (low boy, upflow, etc) is needed to assure an 83 AFUE results in a full line of equipment and a competitive marketplace.

As a secondary issue, if an 83 standard is finalized and results in product availability gaps, an effective date of October 1, 2006 does not provide an adequate time period to develop, manufacture and distribute the additional models needed.

Tier II Eae limit of 800 KHW/year

Setting a maximum Eae is an impractical specification limit. It will result in only those furnaces with small air handlers and lower inputs being certifiable. Units now common in the marketplace with larger inputs, larger blowers, or high cool to heat capabilities (required for many air conditioning markets) will be unable to comply with the Energy Star requirement.

As an alternate proposal, the GAMA directory currently designates those gas and oil furnaces whose electrical usage (Eae) is less than or equal to 2% of the fuel usage (Ef) and we would recommend that Energy Star adopt this or a similar scheme if an electrical requirement is truly necessary. The Eae/Ef ratio designator is a much more appropriate performance indicator that balances the air movement required against the fuel usage, and does not unnecessarily disqualify relatively superior low electrical consumption furnaces with larger inputs, larger blowers, or high cool to heat capabilities.

If you have questions or comments, please contact me.

Sincerely,



Jim Mullen
Director of Technology services
Lennox International Inc.

CC : Rachael Schmeltz--EPA
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