



2311 Wilson Boulevard Suite 400 Arlington VA 22201 USA
Phone 703 524 8800 | Fax 703 562 1942
www.ahrinet.org

August 18, 2021

Ms. Abigail Daken
Manager, ENERGY STAR HVAC Program
United States Environmental Protection Agency
Washington, DC 20460
(Sent via email to MostEfficient@energystar.gov)

Re: Draft 2022 Criteria for ENERGY STAR Most Efficient Designation

Dear Ms. Daken:

The Air-Conditioning, Heating, and Refrigeration Institute (AHRI) submits these comments in response to the U.S. Environmental Protection Agency's (EPA) ENERGY STAR draft 2022 specifications for its "Most Efficient" designation.

EPA proposes to adopt the 120% Average Fuel Utilization Efficiency (AFUE). EPA has referenced the CSA ANSI Z21.40.4 Performance Testing and Rating of Gas-Fired, Air Conditioning and Heat Pump Appliances, understanding that the standard is under revision. Once the standard is available for testing, boilers will be able to be recognized as Most Efficient 2022.

AHRI remains concerned with the proposal for the advance tier for boilers to be $\geq 120\%$ AFUE. Programs must rely on federally mandated and performance-based metrics. While we understand the concept of an aspirational, long-term goal based on advances to gas-heat pump technologies, there is no procedure to measure an AFUE above 100-percent for boilers. AHRI does not find a proposal outside the test procedure capabilities for products not in the market to be reasonable. An industry-accepted test procedure for measuring 120 percent AFUE should be finalized prior to setting program levels. In fact, ANSI Z21.40.4 • CSA 2.94 may not apply to boilers, and it is certainly not the federal procedure to rate boilers. AHRI is concerned that boiler manufacturers would not be able to provide this rating to customers and thus would be excluded from this specification. ANSI Z21.40.4 • CSA 2.94 does not contain AFUE calculations and is currently under revision. AHRI would like to discuss options and opportunities which focus on systems rather than individual appliance ratings for boiler installations.

AHRI recommends that EPA rescind this proposal. We appreciate the opportunity to provide these comments. If you have any questions regarding this submission, please do not hesitate to contact me, kbergeron@ahrinet.org.

Sincerely,

Kyle Bergeron
Regulatory Engineer

cc: L. Petrillo-Groh
H Walter-Terrinoni