



August 7, 2020

Ms. Abigail Daken  
ENERGY STAR Program  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave. NW, MC 6202A  
Washington, DC 20460  
Telephone: (202) 343-9375  
[MostEfficient@energystar.gov](mailto:MostEfficient@energystar.gov)

**Re: A. O. Smith Corporation's Comments Pertaining to the Proposed ENERGY STAR Most Efficient 2021 Recognition Criteria**

Dear Ms. Daken,

A. O. Smith Corporation (A. O. Smith) appreciates the opportunity to provide comments to the U. S. Environmental Protection Agency (EPA) regarding the proposed ENERGY STAR Most Efficient 2021 Recognition Criteria. In summary, A. O. Smith supports the ENERGY STAR proposal to eliminate the boiler Most Efficient program in 2021 as further explained below.

*About A. O. Smith*

A. O. Smith is a global leader in applying innovative technology and energy efficient solutions to products manufactured and marketed worldwide. The company is one of the world's leading manufacturers of residential and commercial water heating and hydronic heating equipment, as well as a manufacturer of water treatment and air purification products. Along with its wholly owned subsidiary, Lochinvar LLC, A. O. Smith is the largest manufacturer and seller of residential and commercial water heating equipment, high efficiency residential and commercial boilers and pool heaters in North America.

*Discussion*

A. O. Smith has enjoyed participating in the ENERGY STAR Most Efficient program for residential boilers since 2013 and using the program as a market differentiator for high-efficiency products. The ENERGY STAR Most Efficient program has raised awareness concerning the important role that residential boilers can play in reducing consumers utility bills. As EPA has noticed, A. O. Smith believes the boiler industry is reaching the limit of increasing the efficiency of conventional gas-fired boiler efficiency as measured by the current metric. A. O. Smith agrees with EPA's assessment that there is a large portion of gas-fired boilers that meet the Most Efficient criteria (*i.e.*, 95% AFUE) and that there is little technical difference amongst these top-tier efficiency products. Lochinvar looks forward to working with the EPA on the development of the next iteration of the ENERGY STAR Most Efficient program for boilers when there is a new technology that can provide significant operational energy savings and further market differentiation.

In conclusion, A. O. Smith appreciates the opportunity to provide comments to EPA to inform its program decisions on the Most Efficient program relating to boilers. Lochinvar stands ready to work with EPA and DOE on the ENERGY STAR program as it continues to promote higher efficiency heating solutions.

Sincerely,

A handwritten signature in black ink that reads "Smiley A. Kenney".

Ashley A. Armstrong  
Director, Regulatory and Technology Policy  
A. O. Smith Corporation  
[aaarmstrong@aosmith.com](mailto:aaarmstrong@aosmith.com)