



April 12, 2016

Abigail Daken
Environmental Protection Agency (EPA)
1200 Pennsylvania Ave. NW
Washington, DC 20460

Re: ENERGY STAR® Commercial Boilers Specification Version 1.0 Interim Proposal

Dear Ms. Daken:

On behalf of Bradford White Corporation (BWC), I would like to express our appreciation for the opportunity to comment on the ENERGY STAR Commercial Boilers Specification Version 1.0 Interim Proposal. Please find our comments below.

While BWC supports the addition of boilers with inputs between 2.5 MMBtu/hr and 5 MMBtu/hr to this ENERGY STAR Specification, we believe the efficiency requirement placed on these products needs to be evaluated further. BWC is concerned with the specified combustion efficiency requirement for those boilers that fall within the discussed input range. We have observed products in the AHRI directory between 2.5 MMBtu/hr and 5 MMBtu/hr that have a rated combustion efficiency that is either the same as or less than the associated rated thermal efficiency. We believe this to be an anomaly resulting from the efficiency calculations required per the BTS-2000 test method. BWC recommends EPA review the products in the AHRI directory that fall within this input range further and how their combustion efficiency compares to their thermal efficiency.

While in our previous comments we recommended no upper limit for input, we agree that boilers larger than 5 MMBtu/hr are not able to be tested at independent test laboratories. In addition, they are less common; more likely to be custom engineered; and may be assembled on site.

As it was pointed out in the Interim Proposal, DOE is currently in two rulemaking processes for commercial boilers, one for the test procedure and the other for the minimum efficiency standards. In lieu of this, in addition to our comments about the relationship of combustion to thermal efficiency, we request that this initial ENERGY STAR specification for commercial boilers is postponed until after the rulemakings are completed and further investigation can be

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performed on the relationship of the efficiency metrics. This will help avoid confusion moving forward if a change in test methodology results in new combustion and/or thermal efficiency ratings.

Bradford White Corporation thanks you for this opportunity to comment on the ENERGY STAR Commercial Boilers Specification Version 1.0 Interim Proposal. We have coordinated our comments with AHRI.

Respectfully Submitted,

Bradford White Corporation

Eric Truskoski
Director of Government & Regulatory Affairs

Cc: B. Carnevale; B. Root; M. Taylor; B. Hill; C. Jacques; C. O'Donnell; C. Sanborn; F. Stanonik;

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