

Furnaces - Version 4.1 Spec - Stakeholder Comments Furnace Fan Proposal

Topic	Comment	Comment Response
General	Three stakeholders do not believe it is appropriate for EPA to adopt the fan energy metric (FER) over four years in advance of the date on which the federal energy conservation standards will take effect.	EPA appreciates the comments submitted by all stakeholders. EPA has decided to put this revision on hold until a later date.
Test data	Two stakeholders indicated that most manufacturers have not even started to test for all products for FER since the compliance date for the FER energy conservation standards is July 3, 2019. Any ENERGY STAR requirement to develop and verify the FER metric prior to the July 3, 2019 effective date would be very onerous for the industry. Therefore it is not necessary to replace the "(e) less than or equal to 2.0%" requirement with a FER requirement.	
Correlation between "e" and FER	One stakeholder asserts that there is no correlation between "e" and FER. The test procedures are so different from each other that we believe that the only way to transition from "e" to FER is to specify the highest FER value of all of the ENERGY STAR furnaces as the minimum allowable for the equivalent ENERGY STAR Version 4.0 specification.	
Continue to use "e"	Three stakeholders believe EPA should continue to require that manufacturers meet the "e" criterion for ENERGY STAR.	