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December 19, 2014

Ms. Abigail Daken
U.S. Environmental Protection Agency (EPA)
ENERGY STAR HVAC Program

Re: Rheem Comments on a FER level specification equivalent to the ENERGY STAR Version 4.0 specification for “e”, such that currently qualified products may remain qualified.

Dear Ms. Daken,

Rheem Manufacturing Company (Rheem) is providing the EPA this submission in response to the November 17, 2014 request to ENERGY STAR furnace stakeholders for Energy Star furnace model test data as specified in the revised Federal Furnace Fan Test Method.

Rheem is privately held with headquarters in Atlanta and U.S. operations in Alabama, Arkansas, California, Indiana, North Carolina, Texas and Utah. In its 89th year of operation, the company is a global manufacturer of residential and commercial heating and cooling systems; tank, tankless, solar and hybrid heat pump water heaters; whole-home standby generators, controls, swimming pool and spa heaters; indoor air-purification products; commercial boilers; and commercial refrigeration equipment. The company's premium brands include Rheem, Raypak, Ruud and Richmond, as well as commercial refrigeration brands Russell, Witt, ColdZone and Kramer, which are part of the company's Heat Transfer Products Group (HTPG) division. Rheem products have been recognized with countless industry and consumer awards for reliability, innovative design and high quality.

Rheem has been actively engaged with the ENERGY STAR program since the program began and is recognized by EPA as manufacturing products that meet the Most Efficient Criteria.

Rheem has tested the current Rheem ENERGY STAR residential furnaces that are listed under the current Version 4.0 requirements to the Federal Furnace Fan Test Procedure. The test results show 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. The “e” descriptor applies only to the heating mode with its associated static pressure setting and flow rate. The FER descriptor addresses the energy consumption in the cooling and ventilation mode as well as the heating mode, each with a different static pressure setting and flow rate. Review of the



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attachment provided as confidential business information will illustrate that there is no correlation between the two fan energy metrics.

Rheem appreciates the opportunity to provide these comments. If you have any questions regarding this submission, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Karen B. Meyers".

Karen B. Meyers
Vice President, Government Affairs
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Attachment: "Attachment to Rheem submittal of FER data for current Energy Star Furnaces 12-19-14 Confidential Business Information (confidential copy)"

