

April 7, 2017

Ms. Abigail Daken
US Environmental Protection Agency
Ariel Rios Building 6202J
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Ms. Daken:

The Consortium for Energy Efficiency (CEE) respectfully submits the following comments in response to Draft 1 Version 4.1 of the ENERGY STAR Residential Furnace Criteria, released by the Environmental Protection Agency (EPA) on March 24, 2017.

CEE is the binational organization of energy efficiency program administrators and a staunch supporter of the ENERGY STAR® Program. CEE members are responsible for ratepayer-funded efficiency programs in 45 US states, the District of Columbia, and seven Canadian provinces. In 2014, CEE members directed over \$6.7 billion of the \$8.7 billion in energy efficiency and demand response program expenditures in the two countries. These comments are offered in support of the local activities CEE members carry out to actively leverage the ENERGY STAR brand. CEE consensus comments are offered in the spirit of strengthening ENERGY STAR so it may continue to serve as the national marketing platform for energy efficiency.

CEE highly values the role ENERGY STAR plays in differentiating energy efficient products and services that the CEE membership supports locally throughout the US and Canada. We appreciate the opportunity to provide these comments.

CEE Recommends Technology Neutral Performance Requirements for Furnace Fans

CEE encourages ENERGY STAR to specify performance criteria that provide manufacturers with full flexibility in designing and engineering products to achieve binational efficiency targets, while also preserving the opportunity for engineering and technology to evolve. CEE has consistently supported a technology neutral approach within its performance specifications on the grounds that specifications are most effective when one set of requirements is applied to a product category. CEE's approach of focusing on efficiency criteria is intended to provide manufacturers with full flexibility in designing and engineering products to achieve binational efficiency targets,

while also preserving the opportunity for engineering and technology to evolve independent of previous limitations and the like.

Our assessment is that criteria requiring an ECM motor for furnace fans can create an unlevel playing field and accordingly undermine the elegant and effective simplicity of the Program's success. In particular, CEE is concerned that certain high performance models that currently qualify for ENERGY STAR recognition, but do not incorporate an ECM motor, will be excluded from the program based on this revision. While only a few models may be disqualified in this manner, it emphasizes that multiple technological pathways may be available to achieve efficient fan performance. EPA indicates that developing a technology neutral performance specification may require product recertification, and may only have a limited effective period; however, CEE recommends that EPA adhere to brand principles and maintain a technology neutral performance specification for furnace fans.

CEE would once again like to thank the EPA for the opportunity to comment on Draft 1 Version 4.1 of the ENERGY STAR Residential Furnace Criteria. Please contact CEE Senior Program Manager George M. Chapman at (617)-337-9262 with any questions about these comments.

Sincerely,



Ed Wisniewski
Executive Director