

## ENERGY STAR Furnaces Draft Version 4.1 Comment Matrix

Topic	Subtopic	Stakeholder Comment	EPA Response
Comment Summary	Definition of ECM	One stakeholder commented that the proposed definition of Electronically Commutated Motor (ECM) may cause confusion amongst stakeholders. The stakeholder suggests replacing the definition of ECM with "high efficiency motor" to include both ECMs and X13 types.	EPA provided a notebox in the draft specification that stated "This definition for ECM encompasses both constant torque and constant airflow brushless permanent magnet motor designs." EPA appreciates the comment and, to ensure clarity for all stakeholders, has updated the definition of ECM in Section 1 to include this information in the final Version 4.1 specification.
Comment Summary	Support for ECM criteria	One stakeholder supports the proposed furnace fan motor requirement as well as the timeline for finalizing the specification revision.	EPA appreciates the support of the proposed revision.
Comment Summary	U.S. South 92 AFUE	One stakeholder commented that the ENERGY STAR U.S. South AFUE criteria should eventually be raised to 92%.	EPA appreciates the comment and plans to assess this in greater detail for the next full revision of the specification.
Comment Summary	Technology neutral furnace fan requirement	One stakeholder commented that EPA should maintain a technology-neutral performance requirement for ENERGY STAR furnace fans. Additionally, the stakeholder commented that there are models that currently qualify for ENERGY STAR, but would not meet this technology-dependent requirement.	EPA acknowledges and appreciates the comment, but has determined that requiring ENERGY STAR furnaces be equipped with an ECM is the best path for the program to recognize efficiency and ensure consumer savings at present. Additionally, EPA followed up with the stakeholder to ensure that all currently certified ENERGY STAR models do meet the ECM requirement based on an analysis of the AHRI directory on February 15, 2017. This analysis was verified on April 18, 2017.