

Topic	Comment	EPA/DOE Response
Qualification Criteria		
Condensing Boiler Lifetime	<p>In line 64 EPA reports having contacted “European regulators” to get information on the relative life expectancies of condensing versus non-condensing boilers in Europe. Other than the reference to the DEFRA analysis in line 66, it is unclear exactly who EPA contacted, what they were asked, and what responses were given that led EPA to conclude that there is no difference in life expectancy.</p>	<p>EPA and DEFRA (in the UK) discussed installation costs, heat exchanger construction, life expectancy, and warranty length. DEFRA has no data which contradict EPA's conclusion that with proper maintenance, condensing and non-condensing modern boilers have similar life expectancy.</p>
	<p>We highly doubt that most US condensing boiler manufacturers based their warranties solely on the warranties provided to them by their OEMs. [Boiler manufacturers] purchase both aluminum and stainless steel condensing heat exchanger[s] from two of the largest condensing boiler heat exchanger manufacturers in Europe (and therefore in the world) – the warranties for these heat exchangers are 3.5 and 5 years respectively. If EPA was correct in its assertion that market forces do not tend to maximize the feasible duration of retail warranties for condensing boilers, we would expect to see much shorter retail warranties applied to at least some of them.</p>	<p>One manufacturer did indicate that their warranty period was guided by that provided by the heat exchanger manufacturers, but the stronger conclusion was that (as stated in the draft specification), "manufacturers have not seen market demand for longer warranties on condensing boilers, and thus have not investigated whether longer warranties are practical."</p>
	<p>We agree with EPA's conclusion that the life expectancy of condensing boilers is similar to that of non-condensing boilers. EPA has conducted a very thorough analysis of the concern raised by some stakeholders that condensing boilers have a shorter life expectancy than non-condensing boilers. We agree with EPA's conclusion that there is no clear evidence showing that condensing boilers have a shorter life expectancy than non-condensing boilers.</p>	<p>Thank you for your comments.</p>
AFUE	<p>We continue to support the proposed specification requirements of 90 AFUE for gas boilers and 87 AFUE for oil fired boilers. The ENERGY STAR boiler specification is in need of an update given the high market share of ENERGY STAR boilers, the availability of higher efficiency boilers, and the recently updated federal minimum standards.</p>	<p>Thank you for your comments.</p>
Effective Date		
General	<p>We support the proposed effective date. There have been no changes to the draft specification since the Draft 2 criteria were published. The Draft 2 specification indicated that the final draft was anticipated in the fourth quarter of 2013 and the effective date would likely be 9 months after finalization of the specification. We think the proposed effective date of October 1, 2014 gives manufacturers sufficient lead time and is warranted given the high market share of ENERGY STAR boilers and the need for an updated specification.</p>	<p>Thank you for your comments.</p>