

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



OFFICE OF
AIR AND RADIATION

December 2, 2010

Dear ENERGY STAR® Furnace Stakeholder or Other Interested Party:

The U.S. Environmental Protection Agency (EPA) welcomes your input on the attached Draft 2 Version 3.0 ENERGY STAR® Furnace specification. Stakeholders are encouraged to submit comments on this Draft to EPA no later than **December 29, 2010**. EPA will host a stakeholder meeting to discuss comments received on the Draft 2 specification on January 6, 2011. More details are provided below.

The attached Draft 2 document addresses feedback received on the previous Draft 1 proposal. The following key changes were made to the previous Draft 1 version:

- **Furnace Fan Efficiency Metric and Test Procedure.** Several stakeholders expressed concern with the use of the draft CSA C823 Standard and AECR metric for purposes of measuring furnace fan efficiency. EPA has instead decided to accept stakeholder suggestions and use the metric “e” to measure furnace fan efficiency. We propose a requirement of $e \leq 2\%$. The metric “e” is calculated based on the outputs from the Department of Energy (DOE) Furnace test procedure, 10 CFR Part 430, Appendix N.
- **Enhanced Testing and Verification Requirements.** Minor revisions were made to this Draft 2 specification, which now aligns with the changes that were made to other ENERGY STAR product specifications in support of third-party certification requirements that will take effect January 1, 2011. The changes made are limited to formatting and clarifications. To be clear, the third-party certification will go into effect on January 1, 2011 for furnaces as for all other products, even though the Version 3.0 Furnace specification will not go into effect until fall 2011.
- **Harmonization of AFUE levels for U.S. North and Canada, AFUE 92 in U.S. South.** EPA conducted a cost effectiveness analysis to evaluate the potential benefits of harmonizing AFUE levels for U.S. North and Canada. Based on this analysis, EPA is now proposing a single 95 AFUE level for the two regions. In addition, the analysis revealed good payback for a 92 AFUE level in the U.S. South.
- **Revised Effective Date.** The Version 3.0 specification is now proposed to take effect on November 15, 2011 based on finalization of the requirements by February 15, 2011.

EPA addresses additional stakeholder comments on Draft 1 in note boxes found throughout the Draft 2 specification.

Submittal of Written Comments

Stakeholders are encouraged to submit written comments on this Draft 2 document for EPA consideration to furnaces@energystar.gov by **December 29, 2010** to be considered in the subsequent Final Draft document. All comments will be posted to the ENERGY STAR Product Development website unless the submitter requests otherwise.

To track EPA's progress in revising the ENERGY STAR Furnace specification, visit the Product Development website at www.energystar.gov/revisedspecs.

ENERGY STAR Stakeholder Meeting

EPA will host a stakeholder webinar on **January 6, 2011 from 1 – 3 p.m. EST** to review comments received on the Draft 2 specification and discuss any additional questions or concerns. EPA intends to release a Final Draft specification for review and comment based on these discussions in mid-January and finalize the requirements no later than February 15, 2011.

Stakeholders interested in participating in the meeting should send an RSVP to furnaces@energystar.gov by January 4, 2011.

EPA appreciates the feedback received thus far on this draft proposal and looks forward to continuing to work with stakeholders to improve the ENERGY STAR Version 3.0 Furnace specification. If you have any questions regarding EPA's proposal, please feel free to contact me at daken.abigail@epa.gov or 202-343-9375. Thank you for taking the time to review this draft specification.

Sincerely,



Abigail Daken
U.S. Environmental Protection Agency
Climate Protection Partnerships Division
ENERGY STAR Program