

March 26, 2013

Ms. Abigail Daken
Product Manager, ENERGY STAR for HVAC
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Dear Abigail:

We have the following comments on the Draft 1, Version 3.0 ENERGY STAR Boiler Specification presented in your February 26, 2013 letter. These comments supplement the comments we presented during the March 18, 2013 webinar.

Definitions

The input limit of “300,000 Btu” in the definition of residential boiler should be “300,000 Btu/h.”

Qualification Criteria

During the webinar we pointed out the need to check that the revision to the DOE furnace/boiler efficiency test procedure currently in process does not alter the analysis of the revised criterion of 90% for gas boilers. That amendment to the test procedure may be finalized as early as May, 2013 which should allow it to be reviewed prior to the finalization of this revised specification. We have no additional comment regarding the revised criterion for boilers at this time.

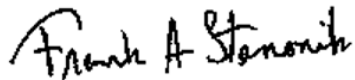
We appreciate EPA’s advance notice regarding its intent to investigate idle loss as a criterion for products that provide both space heating and water heating. Since this revision process will not include any idle loss criterion, we have no detailed comments on that concept at this time. We note that EPA is considering this only for combination appliances. We agree that is the appropriate context for any consideration of the idle loss concept. Idle loss should not be considered as an additional criterion for residential boilers. AFUE is the metric specified by the DOE test procedures and the losses of the boiler as a heating appliance are addressed in that test procedure.

Last month we submitted a comment to DOE recommending that the residential furnace/boiler test procedure should specify the rounding of the AFUE to the nearest tenth of a percent. The CFR section referenced in Section 3) B.b. of the draft specification does not clearly state that the AFUE is rounded to

the nearest whole number. The AFUE listings in our certification programs are rounded to the nearest tenth of a percent and have been so for many years. We encourage EPA to modify this specification to reflect the industry's practice.

We also appreciate the opportunity to comment on the Draft 1, Version 3.0 ENERGY STAR Boiler Specification. If you have any questions, please do not hesitate to call me.

Respectfully submitted,

A handwritten signature in black ink that reads "Frank A. Stanonik". The signature is written in a cursive, flowing style.

Frank A. Stanonik
Chief Technical Advisor