

August 30, 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 2, Version 3.0 ENERGY STAR Boiler Specification presented in your July 25, 2013 letter.

Qualification Criteria

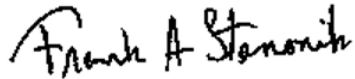
Although we have no specific comment on the proposed revised criterion for gas boilers, we do have a comment on the related test procedure. As the Draft 2 document noted, on July 1, 2013, DOE issued a final rule on the Residential Furnace and Boiler efficiency test procedure to incorporate additional equations to calculate AFUE for two-stage and modulating condensing furnaces and boilers when manufacturers omit the heat-up and cool-down tests during testing. We have not received any ratings changes for the residential boilers listed in AHRI's efficiency certification program that indicate that these revised calculations have caused the ratings of any condensing gas boilers to drop below 90.0%.

We continue to maintain that CFR section 430.23(n)(2), referenced in Section 3) B. c. does not specify that the AFUE is rounded to the nearest whole number. That section states that the AFUE shall be expressed in percent but provides no explicit directions regarding rounding. The values of 90% and 90.7% are both expressed in percent and both satisfy the provision of section 430.23(n)(2) as it is written. There is an ongoing DOE rulemaking to revise the efficiency test procedure for residential furnaces and boilers. DOE has acknowledged that this issue of "How are AFUE values to be reported" is unclear and has committed to resolving the issue as part of this rulemaking. As we noted, the AFUE listings in our certification programs are rounded to the nearest tenth of a percent and have been so for many years. The AFUE percent values shown on FTC EnergyGuide labels are to the nearest tenth. The final EPA Version 4.0 Energy Star specifications for residential furnaces also require reporting AFUE in percent to the nearest tenth. Until DOE officially and clearly resolves this confusion there is no harm in modifying this specification to recognizing what has been the practice for at least the past 20 years; that is the reporting of AFUE rounded to the nearest tenth of a percent. Conversely, there are issues and potential burden if the specification remains unchanged in Version 3.0. In particular, EPA is shortcutting the DOE

rulemaking process that will resolve the issue and EPA may be forcing manufacturers to change their AFUE ratings, along with associated literature and label changes, unnecessarily.

We also appreciate the opportunity to comment on the Draft 2, 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, slightly slanted style.

Frank A. Stanonik
Chief Technical Advisor