

**From:** Josh Gibbons [josh@alliedboilers.com]  
**Sent:** Friday, August 30, 2013 2:34 PM  
**To:** [Boilers@energystar.gov](mailto:Boilers@energystar.gov)  
**Subject:** Draft Energy Star Boiler Specification Comments

Dear Ms. Daken and Boiler Committee

Allied Engineering was disappointed to read the unspecific responses to our comments and concerns surrounding the Energy Star Boiler Specification. We stand by our position that the maintenance costs will be significantly higher and service life expectancy significantly less for condensing boilers when compared to atmospheric boilers – as a result, potential savings in energy use will not materialize as promised. We also reiterate our concern of using AFUE as the sole metric and ignoring the system design when discussing energy efficiency and appropriate heating appliances.

An empirical study the likes of which the EPA and Energy Star are requesting on fuel savings and maintenance costs in order to make better informed policy decisions, would be too costly for private organizations to undertake. However, utility companies that offer appliance leasing and service contracts might have data collections large enough to produce a longitudinal study across jurisdictions and multiple seasons from which meaningful results could be distilled from. We are confident that if made, potential savings would not have manifested and excess burden will have been placed on consumers.

Sincerely,

Josh Gibbons

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