



Lochinvar, LLC
300 Maddox Simpson Parkway ▼ Lebanon, TN 37090
615/889-8900 ▼ Fax: 615/547-1000

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

Ms. Daken,

Thank you for the opportunity to comment on the Draft 1, Version 3.0 Energy Star Boiler Specification. The specification, cover memo and webinar have all been helpful communication tools.

We support the statements made in the AHRI comments letter dated March 26, 2013 except for the comments on idle loss.

It is important that a single agency, the DOE, establish test methods for all types of boilers to maintain consistency of communication in the marketplace and to impose the minimum test burden necessary to ensure accurate representation of product performance. Any promise or discussion of an idle loss requirement when there is no test method identified by the DOE is premature. At this time, we oppose any consideration of idle loss.

Respectfully submitted,

Jeff Kleiss
Product Certification Engineer
Lochinvar, LLC
300 Maddox Simpson Parkway
Lebanon, TN 37090
jkleiss@lochinvar.com
615/889-8901 Ext. 2224