

Comments on EPA ENERGY STAR's Draft 2 Version 3.0 Specification for Boilers
August 30, 2013

On behalf of the Natural Resources Defense Council (NRDC) and the Appliance Standards Awareness Project (ASAP), we respectfully submit the following comments on the EPA ENERGY STAR's Draft 2 Version 3.0 Specification for Boilers.

We support the proposed specification requirements of 90 AFUE for gas boilers and 87 AFUE for oil fired boilers. As EPA indicates, the market share for ENERGY STAR boilers has grown consistently since the specification was first developed and reached over 50 percent in 2012, which is well above the target market share for ENERGY STAR products. This market share is likely to continue to grow, especially given that the new federal minimum standards which took effect in September 2012 are close to the current ENERGY STAR criteria. There are also many higher-efficiency boilers available on the market, including at levels higher than the proposed specification, making the specification ripe for updating.

As EPA indicates, the levels proposed are often cost-effective for consumers, and designating these products as ENERGY STAR will likely increase this cost-effectiveness. In particular, increasing the specification to a condensing level for gas boilers will likely improve the pay-back of these boilers over time as ENERGY STAR drives an increased market share and more contractors gain experience installing condensing boilers, bringing down installation costs.

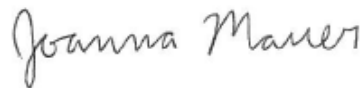
EPA has conducted a thorough investigation of the life expectancy of condensing boilers and we are unaware of any data that contradicts its conclusion. As EPA discussed in the August 20, 2013 webinar, EPA conducted many interviews with different stakeholders including manufacturers, installers, and advocacy groups, to investigate some stakeholders' comments that condensing boilers have a shorter life expectancy than non-condensing boilers. EPA concluded from these interviews that condensing boilers currently on the market do not have a shorter life expectancy with proper installation and maintenance. We believe EPA has conducted a thorough investigation of this issue and are unaware of any data to contradict EPA's conclusion.

Thank you for the opportunity to submit these comments.

Sincerely,



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