

Comments on EPA ENERGY STAR's Final Draft Version 3.0 Specification for Boilers
December 13, 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 Final Draft Version 3.0 Specification for Boilers.

We continue to support the proposed specification requirements of 90 AFUE for gas boilers and 87 AFUE for oil fired boilers. The ENERGY STAR boiler specification is in need of an update given the high market share of ENERGY STAR boilers, the availability of higher efficiency boilers, and the recently updated federal minimum standards. As EPA indicated in its Draft 1 analysis, the levels proposed are often cost-effective for consumers. Additionally, we believe that the first cost of condensing boilers will likely decrease over time with the updated ENERGY STAR specification, as their market share increases and more contractors gain experience installing them, increasing the overall cost-effectiveness and benefits of the revised specification.

We agree with EPA's conclusion that the life expectancy of condensing boilers is similar to that of non-condensing boilers. EPA has conducted a very thorough analysis of the concern raised by some stakeholders that condensing boilers have a shorter life expectancy than non-condensing boilers. We agree with EPA's conclusion that there is no clear evidence showing that condensing boilers have a shorter life expectancy than non-condensing boilers.

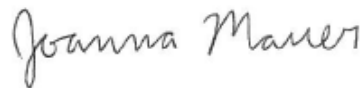
We support the proposed effective date. There have been no changes to the draft specification since the Draft 2 criteria were published. The Draft 2 specification indicated that the final draft was anticipated in the fourth quarter of 2013 and the effective date would likely be 9 months after finalization of the specification. We think the proposed effective date of October 1, 2014 gives manufacturers sufficient lead time and is warranted given the high market share of ENERGY STAR boilers and the need for an updated specification.

Thank you for the opportunity to submit these comments.

Sincerely,



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