



2111 Wilson Boulevard Suite 500 Arlington VA 22201-3001 USA
Phone 703 524 8800 | Fax 703 562 1942
www.ahrinet.org

April 24, 2015

Mr. Ronald Majette
U.S. Department of Energy
Office of Energy Efficiency and Renewable Energy
Building Technologies Program, EE-5B
1000 Independence Avenue, S.W.
Washington, D.C. 20585-0121

Re: NOPR on Amended Efficiency Standards for Residential Boilers,
Docket No. EERE-2012–BT–STD–0047

Dear Ron:

The March 31, 2015 Federal Register included the Department of Energy's (DOE) Notice of Proposed Rulemaking (NOPR) regarding amended efficiency standards for residential boilers. At present the comment period for this NOPR ends on June 1, 2015. On behalf of AHRI's boiler manufacturer members we request that the current 60 day comment period be extended to 120 days.

The NOPR provides a general description of the analysis for this rulemaking but the details of the analysis are provided in the Technical Support Documents (TSD). The TSD is comprised of 17 chapters and 25 appendices; totaling 890 pages. The information in the TSD is detailed and technical. Yet the notice provides only 60 days to review the NOPR and TSD, provide comments on the NOPR and, as necessary, gather data and information that support concerns we may have regarding the underlying analysis provided in the TSD.

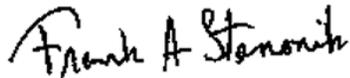
We support the general decision reflected in the NOPR to not propose amended standards that would require all residential boilers to employ condensing technology. However, we do not agree with the specific minimum AFUE levels being proposed for gas and oil boilers. Revisions to federal minimum efficiency standards are a significant matter for manufacturers that directly affects their businesses. The analysis for this NOPR is voluminous and complex. The current comment period of 60 days does not provide sufficient time to review the data that has been made available and then develop appropriate comments and information to submit to DOE.

The review of this NOPR is complicated further by the current rulemaking to revise the DOE efficiency test procedure for residential furnaces and boilers. Our boiler manufacturers in particular have identified changes in the proposed revised test procedures that will change the resultant AFUE measurement. This creates a "moving target" situation. We and our boiler manufacturers must review, analyze, and comment on the proposed amended minimum AFUE standards while at the same time analyze and address the effects of the proposed revised test procedure on the current AFUE ratings of residential gas and oil boilers. In effect, the proposed minimum AFUE levels in the NOPR, which are based on the current DOE efficiency test procedure, are inaccurate since those minimums, when implemented, will be based on a

revised test procedure that recalibrates current AFUE ratings. This is precisely the type of situation DOE's Process Improvement Rule seeks to avoid by stating that DOE will finalize any changes to the test procedure prior to the NOPR on the related energy efficiency standard. 10 C.F.R. 430 Subpart C, Appendix A at 7(c).

In view of the issues noted above, we respectfully request that DOE extend the comment period for this NOPR by an additional 60 days. We trust that you will give immediate attention to this request and look forward to your timely response. If you have any questions or wish to discuss this further, please call us.

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

cc: Mr. Dan Cohen
Mr. Eric Stas