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November 6, 2015

Ms. Brenda Edwards
U.S. Department of Energy
Building Technologies Program, Mailstop EE-5B
1000 Independence Avenue SW
Washington, DC 20585-0121

Re: Proposed Rule Energy Conservation Standards for Residential Furnace
Docket Number EERE-2014-BT-STD-0031

Dear Ms. Edwards:

On October 14, 2015 the Air-Conditioning, Heating, and Refrigeration Institute (AHRI) submitted comments in response to the Department of Energy's (DOE) notice of data availability (NODA) regarding amended efficiency standards for residential non-weatherized issued in the September 14, 2015 *Federal Register*. The following are supplemental comments on that NODA.

On page 55039 of the NODA notice DOE explains that the analysis did not examine mobile home gas furnaces (MHGF) because the issues raised by stakeholders primarily concerned non-weatherized gas furnaces (NWGF). In the case of AHRI's comments on the March 2015 Notice of Proposed Rule, several of the issues we raised do concern MHGFs. In particular, the concerns regarding the number of consumers that would be negatively affected or would switch fuels for heating if an amended minimum efficiency standard of 92%, or similar condensing level AFUE, were adopted as a DOE national regulation. Furthermore, AHRI's concerns with the flaws in the basic tools utilized in the NOPR analysis apply equally to MHGFs. That fundamental concern, of itself, is reason for additional analysis of the proposed minimum AFUE standard for MHGFs.

Accordingly, we request that DOE analyze the alternative concept of separate standard levels for small and large mobile home gas furnaces for the same purpose of minimizing these potential negative aspects of the proposed standard in the March 2015 NOPR.

Respectfully submitted,

Frank A. Stanonik
Chief Technical Advisor