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May 15, 2015

Ms. Ashley Armstrong
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 Revised Test Procedure for Residential Furnaces and Boilers,
Docket No. EERE-2012–BT–TP–0024

Dear Ashley:

The March 11, 2015 *Federal Register*¹ included the Department of Energy's (DOE) Notice of Proposed Rulemaking (NOPR) to revise the efficiency test procedures for residential furnaces and boilers. At present the comment period for this NOPR ends on May 26, 2015. On behalf of AHRI's furnace and boiler manufacturer members we request that the comment period be extended by 45 days.

The NOPR presents the major change to the test procedure as an updating of the reference to the 2007 edition of ASHRAE Standard 103 with some limited modifications. It notes "DOE has tentatively determined that the proposed test procedure amendments would have a *de minimis* impact on the product's measured efficiency." Our initial assessment of the NOPR focused on the effect of the updated reference to ASHRAE Standard 103 -2007. However, further review of all the proposed changes has raised the concern that the proposed test procedure will change the resulting AFUE measurement. Some of these concerns were expressed by AHRI staff and manufacturers at the public meeting to discuss this rule with indication from DOE staff that more information would be provided (see pp. 140-141 of the 2015-03-26 Meeting Transcript); however, to date no follow-up has been provided.

As a result, we have developed a plan to have residential boilers tested by the laboratory that conducts our residential boiler certification program tests (Intertek) to develop comparative data to help us analyze those changes that we believe may cause a different AFUE measurement. Although the test plan is ready, the actual testing will not be done until sometime in June. These same issues are also being considered by our furnace manufacturers based on the information provided to them about the boiler manufacturers' concerns. These issues may also impact the ongoing efficiency standards rulemaking for both residential furnaces and boilers, and we

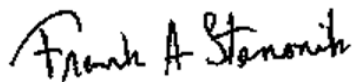
¹ 80 Fed.Reg. 12,876 (March 11, 2015)

believe it is key to resolve address these issues in order to effectively analyze and comment on those rulemakings as well.²

An extension of time is also warranted so that stakeholders may review important information that has not yet been made publicly available. In several locations the *Federal Register* NOPR references a February 2015 “Testing Report” that contains a summary of the data analysis from DOE’s product testing, which was instrumental in determining DOE’s conclusions for several aspects of the proposed test procedure, including the impacts of ambient conditions and determining testing uncertainty (see pp. 12,878; 12,887; 12,890). While the NOPR indicates that this report is available in the rulemaking docket, it is not. The NOPR record remains incomplete until DOE provides this report, and we urge DOE to make it available as soon as possible.

AHRI recognizes that this request for an extension comes late in the current comment period. However, the testing we have planned will be essential to our ability to adequately comment on the rule and additional time will also allow stakeholders to review the additional information that has not yet been made available. In view of the significance of these issues, we respectfully request that DOE extend the comment period for this NOPR by an additional 45 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,



Frank A. Stanonik
Chief Technical Advisor

cc: Mr. Dan Cohen
Mr. Eric Stas

² 80 Fed.Reg. 13,119 (March 12, 2015); 80 Fed. Reg. 17,222 (March 31, 2015).