

Appliance Standards Awareness Project
American Council for an Energy-Efficient Economy
Natural Resources Defense Council

June 3, 2013

Ms. Brenda Edwards
U.S. Department of Energy
Building Technologies Program
1000 Independence Avenue, SW
Mailstop EE-2J
Washington, DC 20585

RE: Docket Number EERE–2013–BT–STD–0021: Energy Conservation Standards for Commercial Warm Air Furnaces

Dear Ms. Edwards:

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP), American Council for an Energy-Efficient Economy (ACEEE), and Natural Resources Defense Council (NRDC) on the request for information (RFI) for commercial warm air furnaces. 78 Fed. Reg. 25627 (May 2, 2013). We appreciate the opportunity to provide input to the Department. We are pleased that DOE has quickly initiated this rulemaking in response to the statutory requirements included in the American Energy Manufacturing Technical Corrections Act (AEMTCA).

We encourage DOE to evaluate the feasibility of condensing heat exchanger technology in commercial warm air furnaces. The Gas Technology Institute's (GTI) Emerging Technology Program for 2012 included a project on high-efficiency gas heating rooftop packages to achieve greater than 90% efficiency,¹ and in 2012, Nicor Gas conducted a pilot project to retrofit a rooftop unit with condensing heating modules.² We also understand that there has been work conducted in Canada on condensing weatherized warm air furnaces. We encourage DOE to look to the experience in Canada which may be relevant for this rulemaking.

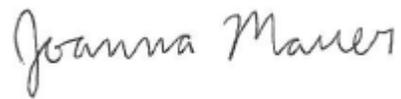
Thank you very much for considering these comments.

Sincerely,

¹ http://aceee.org/files/pdf/conferences/eer/2011/BS4A_Kerr.pdf

²

http://www.centerpointenergy.com/staticfiles/CNP/Common/SiteAssets/doc/CondensingRooftopUnit_RyanKerr.pdf



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