

Appliance Standards Awareness Project
Natural Resources Defense Council

June 30, 2021

Dr. Stephanie Johnson
U.S. Department of Energy
Office of Energy Efficiency and Renewable Energy
Building Technologies Office, EE-5B
1000 Independence Avenue SW
Washington, DC 20585

RE: Docket Number EERE–2019–BT–TP–0003/RIN 1904–AE30: Notice of Proposed Rulemaking for Test Procedures for Direct Heating Equipment

Dear Dr. Johnson:

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP) and Natural Resources Defense Council (NRDC) on the notice of proposed rulemaking (NOPR) for test procedures for direct heating equipment (DHE). 86 Fed. Reg. 20053 (April 16, 2021). We appreciate the opportunity to provide input to the Department.

We encourage DOE to continue investigating off-mode energy use for unvented heaters. In this NOPR, DOE proposes to continue excluding off-mode energy use in the annual energy consumption measurement for unvented heaters.¹ Off-mode energy consumption encompasses energy use that occurs during the non-heating season when the heater is off; DHE models with standing pilot lights can waste a significant amount of energy in off-mode. While DOE acknowledges that consumers could leave the pilot light on during the non-heating season, DOE states that the inclusion of off-mode energy use in the annual energy consumption measurement is not necessary because all identified models with a pilot light come with instructions on how to turn the pilot light off.² However, we believe that these instructions provided may do little to reduce the operating hours of standing pilot lights. For this reason, we encourage DOE to continue investigating pilot light operating hours during the non-heating seasons since considerable energy savings may be realized if the operating hours of pilot lights are minimized.

We support DOE's decision to not include a default jacket loss value for vented floor furnaces. In the NOPR published in 2013 as part of the rulemaking for the January 2015 final rule, DOE proposed using an optional default value for jacket loss in lieu of performing a jacket loss measurement test.³ An optional default jacket loss value would allow products to have a jacket loss higher than the default value without penalty and would result in efficiency ratings that are not representative of actual energy use. Furthermore, including a direct measurement in the test procedure may help encourage manufacturers to develop technology that further minimizes jacket losses.

¹ 86 Fed. Reg. 20061-20062.

² 86 Fed. Reg. 20061.

³ 86 Fed. Reg. 20064.

Thank you for considering these comments.

Sincerely,

Handwritten signature of Kanchan Swaroop in black ink, appearing as 'KS' with a stylized flourish.

Kanchan Swaroop
Technical Advocacy Associate
Appliance Standards Awareness Project

Handwritten signature of Joe Vukovich in black ink, appearing as 'Joe Vukovich' in a cursive script.

Joe Vukovich
Energy Efficiency Advocate
Natural Resources Defense Council