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

April 12, 2019

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: Request for Information for Test Procedures for Direct Heating Equipment

Dear Dr. Johnson:

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 test procedures for direct heating equipment. 84 Fed. Reg. 6088 (February 26, 2019). We appreciate the opportunity to provide input to the Department.

We believe that it makes sense to include floor electric heaters in the definition of "primary heater." In the RFI, DOE notes that floor electric heaters are not currently included in the definition of "primary heater." DOE further notes that floor electric heaters have similar heat output as the types of heaters that are considered primary heaters and may provide the primary source of heat in smaller homes.[1] We believe that it makes sense to include floor electric heaters in the definition of "primary heater."

We believe that it makes sense to include a calculation of annual fuel energy consumption for unvented heaters. The RFI notes that the current test procedure does not include a calculation of annual fuel energy consumption for unvented heaters.[2] There is such a calculation for vented heaters and primary electric heaters. Including a calculation of annual fuel energy consumption for unvented heaters would ensure that any representations of annual energy use for these products would be based on a consistent calculation methodology.

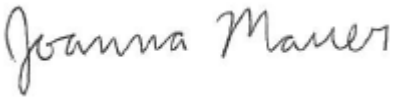
Annual fuel energy consumption for unvented heaters should include standby and off mode energy use. As DOE notes in the RFI, unvented heaters may consume both fossil fuel and electrical energy in standby and off mode due to pilot lights and auxiliary electrical power.[3] In particular, pilot light energy consumption during the non-heating season could represent a significant energy use. In addition, including standby and off mode energy use in a calculation of annual fuel energy consumption for unvented heaters would be consistent with the calculation methodology for vented heaters.

[1] 84 Fed. Reg. 6091.
[2] 84 Fed. Reg. 6092.
[3] Ibid.

We urge DOE not to include a default jacket loss value for vented floor furnaces. The RFI explains that in the 2013 test procedures NOPR, DOE proposed an optional default jacket loss value of 1% for vented floor furnaces. DOE ultimately decided not to adopt the default value after finding that test data indicated an average jacket loss of about 3%.[4] In the RFI, DOE requests comment on whether to consider a higher default jacket loss value. Any default value would allow products to have a jacket loss that is higher than the default without incurring any penalty. Providing a default value could thus result in product efficiency ratings that are not representative of actual energy use. Therefore, we urge DOE not to include any default jacket loss value.

Thank you for considering these comments.

Sincerely,



Joanna Mauer
Technical Advocacy Manager
Appliance Standards Awareness Project

Chris Perry
Senior Analyst, Buildings Program
American Council for an Energy-Efficient Economy

Joe Vukovich
Energy Efficiency Advocate
Natural Resources Defense Council

[4] 84 Fed. Reg. 6093.