

July 6, 2023

Ms. Abigail Daken  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave. NW  
Washington, DC 20460

Re: ENERGY STAR Residential Boilers Discussion Guide June 2023

Dear Ms. Daken,

Burnham Holdings Engineering Company (BHEC) is providing comments in response to Discussion Guide referenced above, specifically EPA's proposal to sunset the current ENERGY STAR program for gas and oil boilers. BHEC is part of Burnham Holdings, Inc. (BHI), which owns several industry leading manufacturers of residential and commercial gas, oil, and electric boilers.

If we are faced with a choice of sunsetting the ENERGY STAR program for boilers or raising the qualifying AFUE above its current 90% level for gas boilers, we would prefer to see the program ended. As EPA is likely aware, most residential gas condensing boilers already achieve 95% AFUE, so raising the specification to this level will do nothing to narrow the market penetration of qualifying boilers. More importantly, given that gas boiler efficiency gains above 90% are essentially a function of latent heat recovery, and that most residential hydronic heating systems operate above the flue gas dew point temperature for much of the heating season, there is a negligible difference between a 95% and 100% AFUE boiler in the real world.

We appreciate the opportunity to provide these comments and hope EPA will consider them carefully. Feel free to reach out to me if you have questions or would like additional information.

Sincerely,



Duane L. Breneman  
President  
Burnham Holdings Engineering Company