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## Proposed Amendments for Higher Efficiency Requirements for Commercial Boilers

The Canadian Institute of Plumbing & Heating supports the efforts of the Government of Canada to achieve higher energy efficiency targets and to lower GHG emissions from the commercial packaged boiler market. Our industry is fully prepared to cooperate and work with NRCan to help facilitate an orderly market transformation.

### CIPH Comments:

While the Institute supports the intent of the proposed amendments, we do have some concerns with the proposed regulations and the impacts that they will have on the marketplace. In its current form, the proposals will create a large gap between Canadian and American requirements that could decrease competitiveness of Canadian manufacturers. Other negative impacts created by these proposals include the following:

- Burden of enforcement will shift to individual municipalities as manufacturers and wholesalers cannot be accountable for differing product application such as replacement or new construction;
- Increases in product costs due to the high research, development and production costs necessary to meet a Canada-only efficiency standard may result in a loss of Canadian manufacturing jobs;
- Differing protocols for different sizes and fuel types create difficulty for manufacturers to meet prescribed results. Since there is no singular metric to report test results, there should be consideration given for a revised compliance range when a product is tested with one fuel and reported for another;
- The potential loss of fuel-oil options will have the greatest negative impact in Aboriginal, northern and Atlantic communities;
- Optimal performance of condensing units is sensitive to proper system design and installation. Rapid changes to regulations will not allow sufficient time for building codes, engineering and installation practices to properly adjust. This may result in gaps of product performance and public safety;
- Non-alignment of performance target timing with those of the U.S.A. Department of Energy beyond 2012 will discourage provincial/territorial adoption and harmonization.

### CIPH Recommendations:

The Institute proposes a revised performance and compliance schedule as summarized in the table on the next page. A key recommendation is that no performance standards beyond March 2, 2015 be considered at this time.

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Boiler Type & Size	Industry Proposed Schedule	MEPS
Small Gas-fired Hot water >300k BTU/h and <2,500k BTU/h	March 2, 2012	ET = 80%
	March 2, 2015	ET = 84%
Small Gas-fired Steam >300k BTU/h and <2,500k BTU/h	March 2, 2012	ET = 77%
	March 2, 2015	ET = 79%
Small Oil-fired Hot water >300k BTU/h and <2,500k BTU/h	March 2, 2012	ET = 82%
Small Oil-fired Steam >300k BTU/h and <2,500k BTU/h	March 2, 2012	ET = 81%
Large Gas-fired Hot Water >2,500k BTU/h	March 2, 2012	EC = 82%
	March 2, 2015	EC = 85%
Large Oil-fired Hot Water >2,500k BTU/h	March 2, 2012	EC = 84%
Large Gas-fired Steam >2,500k BTU/h	March 2, 2012	ET = 77%
	March 2, 2015	ET = 79%
Large Oil-fired Steam >2,500k BTU/h	March 2, 2012	ET = 81%

**CIPH Recommendation Benefits:**

The Institute believes these recommendations will accomplish the shared goals of higher energy-efficiency in a manner that will create higher adoption rates at lower cost while reducing the negative impacts on the Canadian market.

The many benefits of the CIPH recommendations include the following:

- Creation of a stable regulatory environment will encourage Canadian manufacturers to invest in the development and testing of new technologies and 'green' jobs;
- Establishment of more aggressive standards in Canada than the U.S.A. for 2015 will keep Canada at the forefront of environmental stewardship;
- Recognition that condensing technology for oil-fired boilers may not be technically achievable in the near future;





- Measured time frames will allow for needed changes to building codes and standards. This time is also necessary for adequate training of installers for condensing technology;
- Wide-spread availability of condensing units by 2015 will create enhanced opportunity for an industry and utility-led market transformation to achieve the stated goals of NRCan without the need for regulation;
- Consensus-driven market transformation model will allow for orderly adjustment of system design and engineering principles and practice.

CIPH Boiler Manufacturers are prepared to meet with NRCan if necessary to provide any additional information that may be necessary. For a copy of the draft Regulation proposed by NRCan, visit: <http://oee.nrcan.gc.ca/regulations/bulletin/boilers-aug-2010.cfm?attr=4>

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