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January 17, 2020

Mr. Andrew Howse
Ministry of Energy, Northern Development and Mines,
Conservation and Renewable Energy Division
77 Grenville St., 5th Floor
Toronto, ON M5S 1B1

**SUBJECT: Proposal to Increase Minimum Energy Performance Standards (MEPS),
November 2019**

Dear Mr. Howse,

The Canadian Institute of Plumbing & Heating (CIPH), The Heating, Refrigeration and Air Conditioning Institute of Canada (HRAI) and the Air-Conditioning, Heating, and Refrigeration Institute (AHRI) are submitting these comments pertaining to the proposal to amend energy performance standards for residential and commercial water heaters and boilers published in November 2019.

Our organizations continue to support the need to harmonize regulations between USA and Canada, and to harmonize regulations among provinces within Canada. Regulations should ideally be harmonized with U.S. Department of Energy (DOE) efficiency regulations wherever possible. Harmonization provides for greater economies of scale, less burden on manufacturers and distributors, and lower costs for consumers. We commend the Province of Ontario for harmonizing Ontario's efficiency standards for these nine products with Natural Resources Canada (NRCan).

There are a few minor issues that we have identified:

1. For both Commercial Oil-Fired Water heaters and Commercial Gas-Fired Water heaters energy efficiency requirements, the standby loss equations use the measured storage volume V_s . This is not in harmony with the U.S. Department of Energy (DOE) efficiency regulations. We believe that this equation should use the nominal volume V_r to match US DOE requirements. We believe that the NRCan equations should be changed as well, and are currently investigating this with NRCan staff.
2. For both Commercial Oil-Fired Water heaters and Commercial Gas-Fired Water heaters, there is an inconsistency in the metric version (Watt/Litre) of the standby loss equation between Ontario regulations and NRCan Amendment 15 regulations. The first term of the equation in the Ontario regulations is: $Q/0.8$, whereas the first term in the NRCan regulations is: $Q/0.234$. In addition, the equations are not using the nominal volume, V_r , like that used by DOE.

3. The section headings for “Water Heater, Gas-Fired, Instantaneous <73 kW”, and for “Water Heater, Gas-Fired, Instantaneous ≥73 kW” are no longer valid. These capacities are not in alignment with the capacity range described in the text of the section, which is 58.56 kW (200,000 Btu/h) or more.
4. For both Gas-Fired boilers and Oil-Fired boilers ≥ 732 kW Ontario and the US DOE does not set an upper limit in the scope, however NRCAN sets an upper limit of ≤ 2,930.71 kW (10,000,000 Btu/h).

We thank you for the opportunity to comment on these important matters. CIPH, HRAI and AHRI would welcome an opportunity to discuss our concerns further with NRCAN’s representatives.

Sincerely,



Ralph Suppa
CIPH
President & GM



Sandy MacLeod
HRAI
President & CEO



Caroline Davidson-Hood
AHRI
General Counsel

C-Memo: C.05.20

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