

*Eurofuel - initial comments subsequent to the 23-24.02.2010 Meeting of the Technical Working Group to address the technical functioning of the “EcoBoiler” model, related test points and revisions to the Implementing Measures - Eco Design (EuP) Lot 1 (Boilers) and Associated Lots*

## 1. Introduction - Procedural Points and Revised Timeline Suggestion

- a. Eurofuel would like to thank Dr Stephan Kolb of DG TREN/ Energy, and DG TREN’s consultant retained for the Lot 1 “EcoBoiler” model, Mr René Kemna of VHK, for their prompt responses to many of Eurofuel’s comments raised on 11<sup>th</sup> February 2010. Of particular importance is the encouraging progress made towards modelling the efficiencies of non-modulating condensing oil boilers in a more realistic manner.
- b. However, Eurofuel would like to underline that the latest draft version of the “EcoBoiler” model, presented to Working Group members on 24<sup>th</sup> February 2010, is still a “work in progress”, which does not - as yet - enable heating industry stakeholders to satisfactorily input all the parameters required to the model, e.g., the solar thermal component.
- c. In order to progress work on the model in as efficient a manner as possible, Eurofuel therefore respectfully requests a **further period of two weeks** from DG TREN/ Energy **for all stakeholders** to provide an initial appraisal of the revised, draft version of the model (dated 24.02.2010), i.e., a revised cut-off deadline of **19<sup>th</sup> March**.

If the above proposal is acceptable to DG TREN/ Energy, Eurofuel understands that during the period 24<sup>th</sup> February - 19<sup>th</sup> March, the “EcoBoiler” model should then be progressively updated in response to incoming comments, and then re-issued as a “draft final” version soon after 19<sup>th</sup> March 2010.

In Eurofuel’s opinion, there should then logically be a period of up to 6 weeks, to allow heating industry stakeholders to realistically test the performance, reliability, stability and representativeness of the revised “draft final” EcoBoiler model on their available range of products, using *inter alia* real testing results as inputs.

At the end of this second period, stakeholder groups will be able to give more reliable information as to whether the resulting “EcoBoiler” model is “fit for purpose”, and whether its functionality provides results that are reliable.

In parallel with the above process, the text of the expected revised Implementing Measures (IM) documents for Lot 1 (Boilers) must also be reviewed against the corresponding provisions in the “EcoBoiler” spreadsheet model, to ensure coherency and compatibility.

## 2. Suggested Revisions to Date (not exhaustive) by Eurofuel for Inclusion in Present Ongoing Work Regarding the 24.12.2010 draft version of the “EcoBoiler” Model

### a. Suggested Types of “ $\lambda$ ” value/ air-fuel mixture (AFM) inputs to the model, appropriate to Oil-Fired Boilers

There are four option types of “ $\lambda$ ” value/ air-fuel mixture (AFM) currently cited in the “EcoBoiler” model, namely: 1. “Atmospheric”; 2. “Pneumatic”; 3. “Ionisation” and 4. “Next generation”.

The above options are largely specific to gas-fired boilers. The nearest equivalent technology options which are currently available for oil-fired boilers can be approximately covered by two technology options:

- “yellow-flame” burners correspond to option “2. Pneumatic”, approximately; and
- “blue-flame” burners correspond approximately to “3. Ionisation”.

### b. Suggested Method for Inputting Data and Types for Pumps

There are five pump options available in the 24.02.2010 version of the “EcoBoiler” model. Eurofuel’s main comment at the moment is that where a certain type of pump is available in a “package” for a boiler (e.g., a “Variable Speed Pump”), then the relevant pump type must be available from the options within the EcoBoiler model, to enable it to be input in a representative manner, rather than the present “No pump” option.

The “No pump” input option should be reserved for the case where there is no pump in the calculated aggregates.

## 3. Ongoing Procedure - Eurofuel

Eurofuel’s technical experts and member companies are continuing to examine the 24.02.2010 draft version of the “EcoBoiler” model, with respect to its overall “workability” and functionality. This ongoing work also includes reference to points already raised in previous recent Eurofuel EuP Lot 1 papers, from 11th December 2009, and 11<sup>th</sup> February 2010.

Eurofuel looks forward to comments from DG TREN/Energy with regard to the above points concerning the overall Lot 1 procedural process and timelines, the provision

and revision of Implementing Measures documents for Lot 1, and the accompanying “EcoBoiler” model revision procedure.

Finally Eurofuel hopes that these points are useful in attempting to push forward the EuP Lot 1 process on an expedited time schedule, and to achieve scientific rigour balanced with pragmatism.

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