HARMONISED TEST POINT FUEL BOILERS

Eurofuel’s comments on the discussion document

We would like to thank you for the opportunity to comment on the discussion document in the framework of Working Group 2 on Testing.

Summary and main points:

1. All technologies should have a level-playing field: the principle of ‘technology neutrality’ or a ‘level-playing field’ for all technologies is central in the European Union’s approach to climate and energy policy. The comparability between all technologies is therefore a key aspect of eco-design.

2. The impact of the cost of extra testing, in particular on existing boilers, should be carefully assessed. This is a burden to manufacturers which needs to be taken into account.

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Question 5

Do experts agree that there is no valid argument for using different test temperatures and load conditions for assessing the energy performance of a fuel boiler to heat the same dwelling with the same emitters (compared to a heat pump heating this dwelling)?

The average radiator temperature (e.g. 56 °C), which is necessary to reach a certain room temperature (e.g. 21 °C), is independent of the heat generator. It is possible to reach the needed average radiator temperature with different system temperatures:

1. by using a small volume flow with a high temperature coming out of the heat generator (e.g. 71 °C) and a low temperature getting back from the radiator (44 °C) or
2. a high volume flow with a lower temperature coming out of the heat generator (e.g. 58 °C) and a higher temperature getting back from the radiator (54 °C).

Fuel boilers can produce higher temperatures than heat pumps. And with a higher boiler temperature the temperature of the volume flow getting back from the radiator will be lower (see example 1 with small volume flow). So, depending on the system, in and out temperatures of the heat generator can be different even with in the same dwelling.

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Question 6

Do experts agree that a comparison between heat generators becomes more realistic and clearer for consumers and installers when harmonized test conditions are used?

Similar technologies (i.e. gas and oil boilers) should have a level-playing field: the principle of ‘technology neutrality’ is central in the European Union’s approach to climate and energy policy. The comparability between similar technologies is therefore a key aspect which should be reflected in testing.

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Question 7
Do stakeholders find it acceptable to limit boiler testing to the suggested 4 points and derive the missing points through inter-/extrapolation? Are there suggestions for alternatives, e.g. further simplification at lowest temperature test point of HT and LT?
Additional cost of testing and especially of re-testing should be avoided. For this reason, test procedures for fuel boilers should not be modified.

Question 8
Which conditions should be used regarding product settings according to the experts, and to define them?
The real conditions of use affect efficiency and ideally the whole heating system should be taken into account. The manufacturers are of course not responsible for the conditions of use, but the “ideal testing conditions” must not be misunderstood for real life conditions. As product are installed in various different systems, with various different requirements, system parts and system parameters. Therefore, it is not always possible to set the product in “Factory settings” in the production line, but the boiler parameters must be adjusted at the installation site. Testing parameters/settings can be informed in installation instructions. Testing settings are for the manufacturer to define.

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About Eurofuel
The European Heating Oil Association (Eurofuel) represents organisations that promote the use of heating oil and liquid fuels for domestic heating in Europe. Our membership covers 10 European countries, including over 10,000 companies. Eurofuel is engaged in the promotion of existing and innovative techniques for liquid fuels for heating and equipment, in the domestic market. In this way, our members are committed to ensuring the competitiveness and efficiency of heating with oil and liquid fuels, while also reducing its environmental footprint.

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