

June 23, 2020

Ms Stephanie Larose, Secretariat
Interprovincial Gas Advisory Council (IGAC)

Re: Support for Development of a New ORD and Standard

Dear Ms Stephanie Larose,

I am contacting you on behalf of the Canadian Boiler Society (CBS), a not-for-profit society of energy and environmentally concerned companies consisting of boiler manufacturers and supplier companies to the boiler industry in Canada, in support of the Underwriters Laboratories of Canada to develop and publish an Industrial and Commercial Gas-fired Boiler ORD, and in addition a subsequent Bi-National Standard for Canada and the US by Underwriters Laboratories (UL) Standards.

On January 15, 2020 the Standard for *Industrial and Commercial Gas-Fired Package Boilers*, CAN 1-3.1-77 was withdrawn by CSA and as of date has not been replaced. Without a National Standard for Canada, manufacturers of boilers with a greater than $\geq 1/2$ psi inlet gas pressure, greater than ≥ 12.5 Mbtu/hr, high pressure steam, and/or high temperature water, will not have an accepted practice, technical requirements, and/or terminologies for industrial and commercial gas-fired package boilers. This will affect both boiler manufacturers and consumers directly and could potentially lead to inconsistencies in boiler design with increased costs for the Canadian Market.

It is CBS' position that it is critical to have a National Standard in Canada for *Industrial and Commercial Gas-Fired Package Boilers*. These new documents will also allow for new technology to be incorporated into packaged boilers validated by laboratory based testing and evaluation.

We endorse Underwriters Laboratories for development of an ORD and Standard in this subject area. Our understanding is the primary document used for this development will be based on the current US standard, UL 795 *Commercial-Industrial Gas Heating Equipment*. This approach will have minimal impact on manufacturers and consumers as most industrial and commercial gas-fired package boilers currently made in Canada are built to meet the requirements of CAN 1-3.1-77 for the Canadian market and UL 795 for the US market.

Thank you for your time and consideration.

Sincerely,



Paul Ingham
Chair, Canadian Boiler Society