



January 5, 2018

Ms. Ann Bailey
Environmental Protection Agency (EPA)
Branch Chief
ENERGY STAR® Products
1200 Pennsylvania Ave. NW
Washington, DC 20460

Re: Standard Operating Procedure – Revising or Establishing an ENERGY STAR Product Specification

Dear Ms. Bailey:

On behalf of Bradford White Corporation (BWC), I would like to express our appreciation for the opportunity to comment on the ENERGY STAR standard operating procedure for revising or establishing product specifications. Please find our comments below.

As a proud ENERGY STAR program-partner, BWC appreciates the program's efforts in creating a standard operating procedure (SOP) that is consistent with how the program presently operates. Our experience with the applicable staff and ENERGY STAR programs for the products we produce has been positive. We appreciate the informality of the process and ability to iteratively discuss changes to specifications. We believe that the SOP continues to provide stakeholders a streamlined and collaborative process for setting reasonable product specifications.

BWC requests that ENERGY STAR specifications are harmonized with Department of Energy (DOE) test procedures and product definitions, wherever possible. In addition, we suggest that the program limit itself to only introducing product specifications that fall within the scope of measuring product performance in covered DOE test procedures. Such restraint will assist in promoting consistency and harmonization between DOE and ENERGY STAR.

Also, we recommend ENERGY STAR refrain from including other requirements, even optionally, that do not directly affect energy efficiency. These features can add significant cost to the product for no energy efficiency benefit, nor do we feel that the adoption of advanced technologies is

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inhibited by the lack of these features such as those addressed in our November 9, 2017 letter to ENERGY STAR on Commercial Water Heater Version 2.0 Draft 1. This draft included a reporting requirement proposal for whether ancillary equipment such as a Wi-Fi router or proprietary hub were included in products.

Bradford White Corporation thanks you for this opportunity to comment on the ENERGY STAR standard operating procedure for revising and establishing product specifications. We have coordinated our comments with AHRI.

Respectfully Submitted,

Bradford White Corporation

Eric Truskoski
Director of Government and Regulatory Affairs

Cc: B. Carnevale; M. Taylor; R. Simons; B. Hill; C. Jacques; C. O'Donnell; L. Prader; C. Sanborn;
T. Pinto; B. Wolfer;

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