

Preliminary E* Commercial Water heater comments
Harvey Sachs, ACEEE, 3 September 2012

- | Line | Item |
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| 39 | Basic Model should explicitly include (or exclude) capacity (Btu/h and gallons) electric capacity ≥ 1.6 kW for HPWH. Might this encourage 'hybrid' units that actually do most of their work in resistance mode? Given that tankless HPWH are really unlikely (I think), would it be smarter to use an upper limit of "x" watts/gal. of installed capacity? |
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| 81 | I <i>believe</i> but could be wrong that industry practice is to differentiate commercial from residential products by maximum thermostat capability (< 160 F for residential; \geq for commercial. IF this is true and enforceable (e.g., IAPMO code), then might be helpful. What we DON'T want is a spec that encourages very high temperature residential loops, because of potential for scalding. I'm not sure how to handle this, but it seems to be an area that might warrant consideration. |
| 102 | It's a minor point, but should address the question whether a propane unit qualifies if the natural gas "basic model" equivalent qualifies. That would seem to accord with common sense and industry practice. T.E. affected by energy/mole... |
| 102 | The key distinction is between condensing (T.E ≥ 0.90) and non-condensing (T.E. ~ 0.8). In theory, setting the minimum at 0.90 could add more manufacturers and increase competition. However, all brands listing 0.90 in the AHRI on-line directory also offer 0.94 models. However, a 0.90 unit may cost substantially less than a 0.94, while offering $\sim 70\%$ of the gain (relative to 0.80) of a 0.94. If the <i>installed</i> cost differential is large, 0.90 might be worth considering. |
| 203 | Certification, Compliance, and Enforcement (CCE) are the subject of a DOE negotiated regulation process that is being undertaken now, because of concerns that the proposed DOE requirements (and the CFR citation) may be unduly burdensome for products subject to rigorous industry procedures already (such as the AHRI certification program). I suggest acknowledging the ongoing process. To the extent that other EnergyStar programs have accepted AHRI certification, it's incumbent on EPA to do the same or explain why that practice must change for this product class. It's important in part because relatively few commercial water heaters are manufactured. |