



we make life better®

2311 Wilson Boulevard Suite 400 Arlington VA 22201 USA
Phone 703 524 8800 | Fax 703 562 1942
www.ahrinet.org

December 19, 2024

Ms. Abigail Daken
Manager, ENERGY STAR HVAC Program
United States Environmental Protection Agency
Washington, DC 20460

(Submitted via email to HVAC@energystar.gov)

Re: AHRI Comments in Response to ENERGY STAR® *Final Draft Test Method for Central Heat Pump Water Heater Systems – Draft Proposal Issued December 5, 2024*

Dear Ms. Daken:

The Air-Conditioning, Heating, and Refrigeration Institute (AHRI) respectfully submits this letter in response to the ENERGY STAR Final Draft Test Method for Central Heat Pump Water Heater Systems published on December 5, 2024.

AHRI is the trade association representing over 330 manufacturers of heating, ventilating, and air-conditioning equipment, commercial refrigeration equipment, and water heaters. It is an internationally recognized advocate for the heating, ventilation, air conditioning and refrigeration (HVACR) and water heating industry and certifies the performance of many of the products manufactured by its members. In North America, the annual economic activity resulting from the HVACR industry is more than \$211 billion. In the United States alone, AHRI member companies, along with distributors, contractors, and technicians employ more than 704,000 people.

AHRI appreciates the opportunity to provide feedback on the ENERGY STAR Final Draft Test Method for Central Heat Pump Water Heater (HPWH) Systems. AHRI understands and supports the goals of improving energy efficiency and standardizing performance metrics.

Seasonal Metric for Heat Pump Units and AHRI Standard 1300¹

AHRI reiterates its recommendations from its September 13, 2024 comment letter², requesting for the U.S. Environmental Protection Agency (EPA) to pause development of specific test conditions or final performance metrics for commercial HPWH systems while amendments to AHRI Standard 1300³ continues through AHRI's open standards development process.

¹ ANSI/AHRI Standard 1300-2013, ("ANSI/AHRI 1300-2013"), Performance Rating for Commercial Heat Pump Water Heaters, approved by ANSI on October 1, 2013.

² AHRI letter in Response to ENERGY STAR® Commercial Heat Pump Water Heaters Discussion Guide and Draft 1 Test Method for Central Heat Pump Water Heater Systems – Draft Proposal Issued July 31, 2024 (September 13, 2024)

³ *Id.*

The AHRI 1300 Standard Working Group is addressing the seasonal metric items EPA and the U.S. Department of Energy (DOE) identified in the draft test method. AHRI encourages DOE's continued participation in the AHRI 1300 Standard Working Group during the development of a seasonal metric. The water heating market is not accustomed to seasonal metrics and developing such metrics hastily, without proper input from all stakeholders, could lead to confusion in the market.

Conclusion

AHRI appreciates the opportunity to provide these comments. If you have any questions regarding this submission, please do not hesitate to contact me.

Sincerely,



Nicole Colantonio
Director, Regulatory Affairs
Direct: (703) 600-0332
Email: ncolantonio@ahrinet.org