



December 19, 2024

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

Ms. Julia Hagerty
Office of Energy Efficiency and Renewable Energy
United States Department of Energy
Washington, DC 20585

[Submitted via email to HVAC@energystar.gov]

Re: Final Draft ENERGY STAR Test Method for Central Heat Pump Water Heater Systems

Dear Ms. Daken and Ms. Hagerty:

On behalf of Bradford White Corporation (BWC), thank you for the opportunity to comment on the final draft for the ENERGY STAR test method of central heat pump water heater systems (Draft Test Method). BWC is a leading manufacturer of water heaters, boilers, and unfired hot water storage tanks. We are committed to offering our customers a competitive line of energy efficient appliances, and as a testament to our work have been named an ENERGY STAR® Partner of the Year® for the past five consecutive years. Please see our feedback below:

We respectfully recommend against finalizing the Draft Test Procedure at this time. BWC largely supports the goals of Environmental Protection Agency's (EPA) ENERGY STAR programs and test methods. The ENERGY STAR designation can provide a certain degree of guidance and corroboration for consumers and end-users such that when they select equipment with the designation, they are making a choice to select equipment with overall higher energy efficiency performance. AHRI Standard 1300 is a key commercial heat pump water heater (HPWH) performance test method, and its 2013 version, which is referenced in the Draft Test Method is currently undergoing amendments. As commercial HPWHs are a new equipment category within the ENERGY STAR program, we feel consumers and end-users would benefit most from a test method that incorporates the most up to date set of references. We therefore urge ENERGY STAR to allow the current revision process for AHRI Standard 1300 to conclude, and for the updated version of the standard to be published before any ENERGY STAR test method for central HPWH systems is established.

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AHRI Standard 1300 – Key Performance Metric

AHRI Standard 1300 is currently undergoing revision by its Standard Working Group (SWG). Among other considerations for this revision is the creation of a seasonal performance metric for commercial HPWHs.

The concept, available technology, and application of commercial HPWH systems is relatively new to the market. BWC acknowledges that there are commercial HPWH systems that have been deployed in real world applications and that there is some attention being given by various other agencies and organizations to this technology while also encouraging consideration of evolving best practices. We agree that having a standardized performance metric is useful for stakeholders and practitioners so that fair but data-driven decisions can be made when considering commercial HPWH application equipment selections. This is one of many factors driving current considerations from the SWG as it relates to these products. Among other participants in this SWG is the Department of Energy (DOE). We believe this comprehensive consideration of input and discussion points occurring in the SWG must be allowed to run its course prior to enactment of any policies that would incorporate the use of this standard. And then, when published as the newly amended version, with its finalized test conditions and other included data points, the performance standard should be referenced by the ENERGY STAR test method. Our expectation is that concerns regarding the commercial HPWH equipment performance as written in the Draft Test Method will be largely addressed in the revised AHRI Standard 1300 and that further comments on the performance of other “system” equipment considered in the Draft Test Method can then continue.

Thank you again for the opportunity to comment on this matter. If you have any questions, or would like any additional information, please do not hesitate to contact me directly.

Respectfully submitted,

Bradford White Corporation



Tom Gervais
Senior Director, Regulatory Affairs

Cc: R.B. Carnevale; E. Truskoski; B. Wolfer

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