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April 24, 2017

Ms. Abigail Daken  
ENERGY STAR Water Heater Program Manager  
U.S. Environmental Protection Agency  
Ariel Rios Building  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

Dear Abie:

We have the following comments on the Draft 1 Version 3.1 specifications for the ENERGY STAR Program for residential water heaters presented in your March 27, 2017 letter.

We support this proposal to add 1) an option to enable products to be certified for this program using Uniform Energy Factor ratings based on the Uniform Efficiency Descriptor test procedure and 2) optional reporting of Critical Fault Alarm functionality. Regarding the second proposed change, some of our members have concerns about it but, so long as it is only an option there is general support for it. We agree also with the decision to not include any changes that would affect the status of models currently certified as complying with the ENERGY STAR Program for residential water heaters.

We have two comments on specific criteria in Appendix A. The minimum first hour criterion in Table 1 for electric water heaters should be 45 gallons. The conversion calculation for heat pump water heaters is:  $\text{New FHR} = -4.2705 + 0.9947 \times \text{FHR}_p$ . Using the existing criterion of 50 gallons for  $\text{FHR}_p$ , this calculation comes out to 45.4645 which rounds down to 45 Gallons. The minimum UEF criterion for gas water heaters larger than 55 gallons and tested to the medium draw pattern should be 0.77. Since the calculation is a more involved we have not reproduced it here, but like the FHR issue noted above, our calculation of the converted UEF at the medium draw pattern results in a value of 0.77.

We appreciate the opportunity to comment on this draft of the Version 3.1 Residential Water Heaters Specification. If you have any questions, please do not hesitate to call me.

Respectfully submitted,

A handwritten signature in black ink that reads "Frank A. Stanonik". The signature is written in a cursive, slightly slanted style.

Frank A. Stanonik  
Chief Technical Advisor