



April 24, 2017

Ms. Abigail Daken
Product Manager, ENERGY STAR for HVAC
U.S. Environmental Protection Agency

Submitted electronically to WaterHeaters@energystar.gov

Re: ENERGY STAR® Program Requirements, Product Specification for Residential Water Heaters, Eligibility Criteria 4, Draft 1 Version 3.1

Ms. Daken,

Thank you for the opportunity to comment on the Product Specification for Residential Water Heaters, Eligibility Criteria 4, Draft 1, Version 3.1 issued on March 27, 2017. The A. O. Smith Corporation (“Company”) is a proud ENERGY STAR program partner and prides itself on its strong working relationship with you and the Product Management team at EPA.

Regarding the requirements as set forth in Version 3.1 for residential water heaters, the Company is supportive of the specification standards as outlined in Draft. Consistent with its support, however, the Company does have some concerns with the inclusion of the optional certification criteria in Section 3E of the Draft (i.e. Optional Critical Fault Alarm Reporting) which appear below:

Critical Fault Alarms

Efficiency

While critical fault alarms are a feature seen in heat pump water heaters, and are included in heat pump product specifications issued by organizations like the Northwest Energy Efficiency Alliance (NEEA), this feature is not primarily related to efficiency. As such we would prefer that mandatory Energy Star specifications remain efficiency focused and not include peripheral features and functions that do not improve efficiency.

Costs

As you know, overall consumer purchases of Energy Star qualified residential water heaters remain a very low percentage of the residential market (e.g. approximately 5%). Along those lines, requiring fault alarms has the potential to add complexity and cost to an Energy Star water heater without a corresponding added value, which could make them less attractive to consumers. This is especially true for gas-fired water heaters. Customer demand and a competitive environment will drive features like alarms and remote notification where they have a place to add value in the residential water heater market and should be left out of Energy Star specifications.

Precedent

Similar to equivalent specifications issued by Energy Star over time, the “optional” certification requirement of today often transforms into a “mandatory” requirement tomorrow. As our comments suggest, peripheral features and functions that do not improve the efficiency of a product should not be part of the Energy Star program.

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

Best Regards,

A handwritten signature in black ink, appearing to read 'Joshua C. Greene', with a stylized flourish at the end.

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& Industry Affairs
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