



November 9, 2017

Abigail Daken
Environmental Protection Agency (EPA)
1200 Pennsylvania Ave. NW
Washington, DC 20460

Re: ENERGY STAR® Commercial Water Heaters Specification Version 2.0 Draft 1

Dear Ms. Daken:

On behalf of Bradford White Corporation (BWC), I would like to express our appreciation for the opportunity to comment on the ENERGY STAR Commercial Water Heaters Specification Version 2.0 Draft 1. Please find our comments below.

BWC supports the proposed efficiency level for commercial heat pump water heaters. We have concerns of the introduction of a new product category – commercial-duty residential heat pump water heaters, irrespective of the proposed efficiency level. As EPA has acknowledged, this presents a misalignment with the Department of Energy’s (DOE) product categories, and we currently do not see a value in digressing from DOE’s definitions/product categories in this instance.

If EPA proceeds with introducing the new product category of commercial-duty residential heat pump water heaters, we are concerned with the applicability of the Uniform Energy Factor (UEF) test procedure to the products that are encompassed by the definition for this category. We do not manufacture products that would fall into this category; however, we see potential problems with conducting the UEF test on these products. For instance, if these products are not required to have a tank, will the test be conducted as if the product is an instantaneous water heater? If so, is the same test setup, as well as maximum GPM test appropriate?

BWC supports EPA’s decision to remove the safety requirements from this specification. These requirements were unnecessary given the fact that being certified to the applicable safety standard is a prerequisite to be able to sell the product.

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In this specification, EPA proposed additional reporting requirements as it relates to the following: fault detection and display; performance; energy savings; and a predictive maintenance alert. BWC does not support the requirement to report, let alone trying to drive these forms of functionality to a point where they are required to qualify as ENERGY STAR. We do not feel these items are inhibiting the adoption of advanced technology and can add significant unnecessary cost.

As a follow-up to the questions presented during the webinar, it is our understanding that purchasers for commercial installations are readily choosing to purchase higher efficiency products where the additional upfront cost can be justified through a short payback period. Another question asked during the webinar was, “do installations that use high efficiency water heaters tend to have a larger number of smaller units?” It depends on the specific application. If the question is based on if the application is switching from tank type to tankless, then yes that is typically the case to account for the loss in dump load. In other instances, more than one water heater may be installed to split up the water heating load and provide redundancy. This allows the application to operate in part when one water heater requires maintenance or replacement.

Bradford White Corporation thanks you for this opportunity to comment on the Draft 1.0 ENERGY STAR Commercial Water Heaters Specification Version 2.0. We have coordinated our comments with AHRI.

Respectfully Submitted,

Bradford White Corporation

Eric Truskoski
Director of Government and Regulatory Affairs

Cc: B. Carnevale; M. Taylor; R. Simons; B. Hill; C. Jacques; C. O'Donnell; L. Prader; C. Sanborn; B. Wolfer; F. Stanonik;

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