



Commissioners

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02/26/2021

US Environmental Protection Agency
ENERGY STAR Water Heaters Product Development
Attn: Abigail Daken
Product Manager, HVAC

Clark Public Utilities appreciates the opportunity to provide written comments regarding the Energy Star Final Draft Version 4.0 Water Heater Specifications. Clark Public Utilities serves over 200,000 customers in SW Washington and has been a leader in energy conservation for nearly 40 years. At a high level we are in support of the 4.0 specifications and welcome the advancements within the new standards. Clark Public Utilities believes water heaters, specifically HPWH's will continue to play a pivotal role in meeting our energy conservation goals in the future.

Regarding Section 4 of the specifications, Connected Product Criteria, we do have one suggestion for consideration related to subsection D (a), "DR Communications Protocols". Clark Public Utilities has found previous success in demand response water heater pilots that employed the CTA 2045 communications device and we believe mandating that exclusive option within these specifications could provide for a smoother introduction of scaled water heater DR programs in the future. By including both the CTA 2045 and the OpenADR 2.0b option we believe a barrier may get created that could slow progress in this important work.

Thank you for the opportunity to provide these comments. Clark Public Utilities looks forward to the 4.0 specifications and the continued partnership with Energy Star.

Regards,

A handwritten signature in black ink, appearing to read "Debbie DePetris".

Debbie DePetris
Energy Services Manager
Clark Public Utilities