



February 19, 2021

US ENVIRONMENTAL PROTECTION AGENCY  
OFFICE OF AIR AND RADIATION  
WASHINGTON D.C, 20460

Dear Abigail Daken,

Thank you very much for the opportunity to comment on the new ENERGY STAR Final Draft Version 4.0 Water Heaters Specification. I represent Seattle City Light, one of the nation's largest municipally owned utilities serving more than 420,000 homes and 49,000 businesses throughout Seattle, Shoreline, Lake Forest Park, Burien, Renton, Tukwila, SeaTac, Normandy Park, and Unincorporated King County.

City Light has the longest continually running utility energy efficiency program in the country, and conservation is an essential value of our utility and community. A high-priority focus for us in coming years is helping our residential and business customers purchase high-efficiency hybrid electric water heaters.

I respectfully would like to submit the following comments on the Final Draft Version 4.0.

### Seattle City Light Summary Comments

Section	Comment	Rationale
1B- Definitions	Define Cool Climate Efficiency (CCE), formally known as the Northern Climate Uniform Energy Factor.	Alignment with Washington State Residential Energy Code and NEEA's test procedure requirements for NEEA's Tier 1 – 4 hybrid heat pump water heaters.
5A- Test Requirements	Ask for voluntary reporting from manufacturers for (1) performance of water heaters at 50 degF ambient air / 50 degF inlet water, representative of water heater performance for equipment installed in semi-conditioned and unconditioned locations in cool climates (E50) and (2) performance of water heaters at 95 degF ambient air / 67.5 degF inlet water temperature (E95).	Voluntary reporting from manufacturers would show the CCE value in AHRI and ENERGY STAR. This would allow cooler climate utilities to use ENERGY STAR and AHRI more easily as a reference for "midstream" rebate programs. Currently, AHRI and ENERGY STAR only report UEF values. UEF values are not representative of hybrid heat pump water heater performance in cooler climates.

	<p>E50: Follow standard DOE 24-hour test procedure with the following adjustments:</p> <ul style="list-style-type: none"> <li>• Ambient conditions shall be 50°F dry bulb, 43.5°F wet bulb (58% RH)</li> <li>• Inlet water temperature: 50°F</li> </ul> <p>E95: Follow standard DOE 24-hour test procedure with the following adjustments:</p> <ul style="list-style-type: none"> <li>• Ambient conditions shall be 95°F dry bulb, 82°F wet bulb (40% RH)</li> <li>• Inlet water temperature: 67°F</li> </ul>	
4Da- Demand Response	<p>Require (i) <u>ANSI/CTA-2045-A, or equivalent</u> and (ii) <u>the March 2018 version of the ANSI/CTA-2045-A application layer requirements</u> as the standard for all electric water heaters.</p>	<p>Washington state policy alignment for products sold after Jan 1, 2021. RCW 19.260.080 (1)(a) requires "The product must have a modular demand response communications port compliant with: (i) The March 2018 version of the <u>ANSI/CTA-2045-A</u> communication interface standard, or equivalent and (ii) the March 2018 version of the ANSI/CTA-2045-A application layer requirements."</p>

Sincerely,



Emma Johnson  
 Sr. Energy Management Analyst & Program Manager  
 Seattle City Light