



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
WASHINGTON, D.C. 20460

OFFICE OF  
AIR AND RADIATION

March 27, 2017

Dear ENERGY STAR® Residential Water Heaters Brand Owner or Other Interested Party:

With this letter, the U.S. Environmental Protection Agency (EPA) is proposing to amend the ENERGY STAR Residential Water Heaters specification to enable products to be certified using the Uniform Energy Factor (UEF) metric and current Uniform Test Method for Measuring the Energy Consumption of Water Heaters (10 CFR 430, Subpart B, Appendix E). In addition, EPA has added a definition and optional reporting for Critical Fault Alarm functionality, a feature the Agency sees as having significant consumer value. These changes will be incorporated in a Version 3.1 specification. Products previously certified per the current performance requirements under Version 3.0 will not be affected.

### **Summary of Proposal**

Definitions included as part of this change align with 10 CFR Parts 430 and 431. Performance requirements have been converted directly from EF requirements to UEF requirements using DOE's mathematical conversion factor, without any increase in stringency. Note that criteria for gas-fired storage water heaters are broken out by draw pattern to ensure differentiation from gas-fired storage water heaters at the DOE minimum performance. Also, EPA has maintained a single performance level for gas-fired instantaneous water heaters. EPA expects that new products larger than two gallons will perform at or above the proposed level based on conversations with manufacturers of similar products.

For products certified based on EF, partners should refer to the 10 CFR Parts 200 to 499 edition revised as of January 1, 2014 for definitions and test requirements. EPA will post an abbreviated version of these requirements titled "*Historical Water Heaters Test Method*" on the ENERGY STAR Water Heaters for Partners webpage for stakeholders' convenience. For products certified based on UEF, partners should refer to 10 CFR 430, Subpart B, Appendix E and 10 CFR 431, Subpart G. UEF ratings derived via DOE's mathematical conversion rather than through testing, which DOE will accept through December 29, 2017, may also be used for certification to ENERGY STAR. Products certified with UEF will be verified pursuant to UEF testing whether the certified UEF value was originally reported from a UEF test or from an EF value that was converted to UEF.

### **Stakeholder Meeting**

EPA will host a stakeholder webinar meeting on **April 6, 2017** at 2 p.m. ET to discuss the Draft Version 3.1 Specification and address stakeholder comments and questions. If you would like to participate, please register prior to the webinar [here](#). Stakeholders are encouraged to inform EPA of any industry events that may conflict with this proposed date.

### **Comment Submittal Process**

If you have comments or concerns about the proposed Version 3.1, please submit them by **April 24, 2017**, to [WaterHeaters@energystar.gov](mailto:WaterHeaters@energystar.gov). All comments will be posted to the ENERGY STAR water heater product development webpage unless the submitter requests otherwise.

Please direct any specific questions to Abigail Daken at EPA, [Daken.Abigail@epa.gov](mailto:Daken.Abigail@epa.gov) or 202-343-9375 and Jacob Bayus at ICF, [Jacob.Bayus@icf.com](mailto:Jacob.Bayus@icf.com) or 202-791-8871. Please direct questions about test methods to Catherine Rivest at DOE, [Catherine.Rivest@ee.doe.gov](mailto:Catherine.Rivest@ee.doe.gov) or (202)-586-7335. EPA intends to finalize Version 3.1 as soon as possible, and certainly by June 12, 2017. Once finalized, new products may be certified using the UEF metric immediately.

Thank you for your continued support of the ENERGY STAR program.

Sincerely,

A handwritten signature in cursive script, appearing to read "Abigail Daken".

Abigail Daken  
U.S. Environmental Protection Agency  
ENERGY STAR HVAC Program