

March 4, 2021
Via Electronic Mail

Ms. Abigail Daken
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, D.C. 20406

Re: Comments for the Final Draft Version 4.0 ENERGY STAR Water Heater specification

Thank you for allowing BlocPower the opportunity to comment on the Final Draft Version 4.0 of the ENERGY STAR® Residential Water Heater Specification released on October 28, 2020.

BlocPower sources, designs, develops, and finances the installation of energy efficiency and clean energy upgrades in small multifamily and commercial properties in American cities. BlocPower creates micro-portfolios, or “blocs” of shovel-ready clean energy projects and connects them to investors seeking social, environmental, and financial returns. BlocPower has successfully completed hundreds of energy efficiency projects in multi-family buildings and has a pipeline of over 1,500 energy efficiency projects in small to medium sized commercial buildings slated for execution over the next 36 months.

As a service product provider, BlocPower has a strong interest in future-proofing both the communications protocols and open-standards with the following recommendations:

- 1) **BlocPower supports a standardized physical communications port/pathway attached to the water heater with IoT capability installed at time of manufacturing.**
A recent Water Heater Demonstration report stated, retrofitting and aftermarket solutions (using proprietary controls and protocol converters connected to a virtual end node) will double the install costs for water heaters with demand response capabilities in the near term (by 2039 install costs will increase 8X).
- 2) **BlocPower recommends aligning with CTA-2045-B.**
While the current optional grid connected criteria is CTA-2045-A, BlocPower recommends aligning with CTA-2045-B due to the approved updates that match current industry practices (i.e. California’s Building Energy Efficiency Standards, JA13 for Water Heater Demand Management, or JA13).
- 3) **BlocPower recommends expanding and clarifying the acceptable language responses to the U.S. DOE’s test method to include OpenADR 2.0-certified systems.**
The current test method facilitates testing CTA-2045-A-compliant responses without a requirement to align with language used in other open standards, such as OpenADR 2.0b. Since the specification allows for other open standards to be used to provide water heaters with the connected device capabilities, we recommend adding more information in the test method to generalize these response requirements to open standards other than CTA-2045-A.

Thank you again for considering BlocPower’s comments and position in the market. We believe the key to customer success and resource cost-effectiveness, as identified by a broad consortium of stakeholders, is widespread adoption of a standardized approach to communicating to loads that have flexibility of its electricity usage.

Respectfully Submitted,

Abhishek Dash
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