



June 24, 2022

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

Re: ENERGY STAR® Residential Water Heaters Final Draft Version 5.0 Specification

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 Residential Water Heaters Final Draft Version 5.0 Specification. Please find our comments below.

While BWC appreciates EPA lowering the proposed Uniform Energy Factor (UEF) levels for both gas-fired residential and residential-duty commercial storage water heaters, we believe EPA didn't lower the levels enough. With the proposed levels, there are limited products on the market that meet these levels, thereby limiting what is available to consumers in these product categories. This is especially true for the residential gas-fired storage product category.

EPA continues to propose including additional reporting requirements, which is the case in this Final Draft Specification. Even if they are optional currently, BWC is concerned with this trend, especially given that we anticipate EPA will make these items mandatory in the future. While it may seem trivial to add one extra field, it becomes very burdensome to manufacturers when you consider the number of models we have coupled with all the regulatory and other reporting requirements we already have to maintain for our models. With that said, BWC opposes the reporting of NOx emissions for gas-fired instantaneous and residential-duty commercial products, as this information is already readily available in multiple other places. Our concerns on additional reporting requirements also extend to heat pump water heaters (HPWH). We are opposed to adding the upper compressor cut-off temperature, even as optional, for the reasons stated above.

We would like to reiterate our concerns expressed in two previous letters, from December 2020 and November 2021, about setting levels for 120V HPWHs without products commercialized.

Bradford White Corporation thanks you for this opportunity to provide comments on the ENERGY STAR Residential Water Heater Specification Final Draft Version 5.0 Specification. Please let me know if you have any follow-up questions.

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Respectfully Submitted,

Bradford White Corporation

Eric Truskoski
Senior Director of Government and Regulatory Affairs

Cc: R.B. Carnevale; B. Hill; L. Prader; C. Sanborn; C. VanderRoest; J. Robertson; K. Doyle; B. Wolfer;

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