



September 27, 2010

Dear Ms. Kathleen Vokes:

On behalf of Bradford White Corporation (BWC), please accept our thanks for the opportunity to comment on the proposed water heater ENERGY STAR® Partner Commitments and Product Specification. Our comments are provided below for your review and consideration.

As stated in previous correspondence, BWC agrees it is important the ENERGY STAR brand maintain its value. Therefore, the introduction of Qualification and Verification testing into the ENERGY STAR program and Partner Commitments is a testament to the program's enhancement.

In regards to the draft version 1.1 of the Product Specification, BWC agrees with the addition of product families, as well as the method of testing and qualifying models that are part of a family. This practice is used in the AHRI program, which is accepted by the DOE and has proven successful over many years. The scope was updated to exclude combination space and water heating units. BWC feels that this type of water heater should still be included in the program. These water heaters provide the same utility and have the same requirements as a High Efficiency Gas Storage or Gas Condensing water heater.

BWC recommends that the process of using Significant Digits and Rounding be revised. The current DOE test procedure can have over four percent of error due to allowable instrumentation and measurement tolerances. Therefore, a water heater would not meet the specification if rounding were not allowed, though the water heater's noncompliance is likely due to the testing error.

In addition to rounding, BWC strongly feels that a four percent tolerance needs to be introduced on all specifications. The error associated with the DOE test, along with no rounding, does not allow for any variance in the manufacturing of a water heater. This means that a manufacturer would be required to build water heaters in excess of their stated EF rating, which is not feasible from a business case standpoint.

Again, Bradford White Corporation thanks you for this opportunity to comment on the proposed water heater ENERGY STAR Partner Commitments and Product Specification. We urge the EPA/DOE to modify the criteria pursuant to our comments.

Respectfully submitted,

Bradford White Corporation

Michael W. Gordon
Vice President, Engineering

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