



November 11, 2021

Abigail Daken  
U.S. Environmental Protection Agency  
Office of Air and Radiation  
William Jefferson Clinton Building  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

**California Energy Commission's Comments on October 5, 2021, ENERGY STAR® Version 5.0 Residential Water Heater Draft 1 Specification**

Dear Abigail Daken:

The California Energy Commission (CEC) is the primary energy policy and planning agency for the State of California. One of the CEC's chief mandates is to reduce the wasteful, uneconomic, inefficient, and unnecessary consumption of energy and water in the state by prescribing standards for minimum levels of operating efficiency for appliances that consume a significant amount of energy or water on a statewide basis.

The CEC supports and echoes the comments submitted in this product specification proceeding on November 11, 2021, by the Appliance Standards Awareness Project, the American Council for an Energy-Efficient Economy, and other signatories; supports and echoes the comments submitted by the California Investor-Owned Utilities; and offers the following additional comments.

Encouraging the most efficient water heaters is critical in meeting President Biden's goal of 50% reduction in greenhouse gas emissions by 2030<sup>1</sup> and economy-wide net-zero emissions by 2050.<sup>2</sup> The CEC appreciates the U.S. Environmental Protection Agency's (EPA) update to the ENERGY STAR specification for residential gas-fired storage and instantaneous water heaters to help meet these climate goals. In particular, the CEC supports the EPA's proposal to elevate the ENERGY STAR criteria for residential gas-fired storage water heaters to heat pump levels.

Increasing the deployment of high-efficiency residential water heaters is a necessary component of meeting California's climate and energy goals, as described in the CEC's

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<sup>1</sup> A Proclamation on Earth Day, 2021 (April 22, 2021). Available at: <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/04/22/a-proclamation-on-earth-day-2021/>.

<sup>2</sup> Executive Order on Tackling the Climate Crisis at home and Abroad (January 27, 2021). Available at: <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/27/executive-order-on-tackling-the-climate-crisis-at-home-and-abroad/>.

recent Building Decarbonization Assessment<sup>3</sup> and demonstrated in California's recent statewide 2022 building energy code proceeding.<sup>4</sup> Improving the specification for gas-fired storage water heaters will help California's efforts to improve the energy efficiency of residential buildings.

However, while the CEC appreciates EPA's proposal to moderately increase the specifications for gas-fired instantaneous water heaters, it is imperative to increase the stringency even more. The EPA's proposed specification for gas-fired instantaneous water heaters would allow 15% of the gas-fired instantaneous water heater market to earn the ENERGY STAR designation.<sup>5</sup> In order to achieve the energy savings and emissions reductions required to meet our state and national climate goals, the CEC encourages the EPA to require all gas-fired water heaters eligible for ENERGY STAR designation to exceed the efficiency levels of existing gas-fired products on the market.

The CEC relies on strong federal leadership for advancing standards that reduce the wasteful consumption of energy and the unnecessary emission of harmful greenhouse gas emissions. EPA's ENERGY STAR program consistently establishes specification criteria that advance the market toward the most efficient products, which ultimately saves consumers money and protects our natural resources. The CEC supports the EPA's efforts to update the specification for residential gas-fired water heaters and urges EPA to continue identifying opportunities to improve the criteria for these products, especially residential gas-fired instantaneous water heaters.

The CEC appreciates the opportunity to comment on the development of this specification. If there are any questions about these comments, please contact Michael Murza at (916) 891-8146 or at [michael.murza@energy.ca.gov](mailto:michael.murza@energy.ca.gov).

Sincerely,



ANDREW MCALLISTER  
Commissioner

cc: Michael Murza, Senior Attorney, Office of the Chief Counsel

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<sup>3</sup> Developed pursuant to California Assembly Bill 3232 (Friedman, Chapter 373, Statutes of 2018); adopted by the CEC on August 11, 2021. Available at: <https://www.energy.ca.gov/publications/2021/california-building-decarbonization-assessment>.

<sup>4</sup> 2022 California Building Energy Code Proceeding. Available at: <https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency>.

<sup>5</sup> ENERGY STAR Program Requirements: Product Specification for Residential Water Heaters, Draft 1, Version 5.0, lines 126-128. Available at: [https://www.energystar.gov/products/spec/residential\\_water\\_heaters\\_specification\\_version\\_5\\_0\\_pd](https://www.energystar.gov/products/spec/residential_water_heaters_specification_version_5_0_pd).