

ENERGY STAR® Residential Water Heaters Version 5.0 Final Draft Specification Stakeholder Comment Matrix

Topic(s)	Comment Summary	EPA Responses
Gas Storage Water Heaters UEF Criteria	<p>Seven stakeholders opposed the final draft gas water heater efficiency criteria. Of those seven:</p> <ul style="list-style-type: none"> - Six recommended lower UEF criteria - One recommended higher UEF (Draft 1 proposal of 0.95). <p>Five commentors supported the levels set in the final draft specification.</p> <p>Two stakeholders recommended two-tiered criteria for gas storage water heaters, recognizing gas heat pump water heaters with a higher tier.</p>	<p>EPA will retain the final draft criteria, as the best balance of savings, availability, and cost. Any gas heat pump water heaters that enter the market will be able to certify. EPA has found that the simplicity of a simple message for consumers is more effective than additional tiers.</p>
Sunset Gas Products In The Near Future	<p>Three stakeholders commented in opposition to the statement that gas products may be sunset in upcoming revisions.</p> <p>One stakeholder encourages ENERGY STAR to sunset both instantaneous and gas storage water heaters in the next revision.</p>	<p>EPA remains open to additional information on the place of natural gas in the future of decarbonized water heating.</p>
Guiding Principles	<p>One stakeholder argues that the ENERGY STAR Products Program Strategy and Guiding Principles states that standards should recognize products that "are cost effective from the purchaser." The stakeholder believes that the gas storage water heaters that would meet the proposed criteria do not possess a strong value proposition.</p>	<p>EPA agrees that the value proposition is weak, which is one reason that sunsetting the gas water heater criteria in the near future is appropriate.</p>

NOx Reporting Requirements	<p>Three stakeholders are opposed to NOx reporting requirements, citing issues like added certification burden.</p> <p>One stakeholder is in support of the new NOx requirement.</p>	The addition of NOx reporting criteria was not our intention, and it has been completely removed from the final specification.
Low Income Households	Two commentors noted that the changes may have an effect on low-income families, mentioning factors like product installation (especially related to venting) and availability.	EPA agrees that access to efficient appliances for low-income families is a priority, but after much thought and discussion with stakeholders is convinced that limiting the effectiveness of the specifications is not a solution. We are pursuing other pathways to address the issue.
Test Method to Validate Demand Response	<p>Three stakeholders commented in support of the revised test procedure for demand response.</p> <p>One of those three stakeholder requested that the EPA makes the connected criteria portion of this final draft become effective immediately on the date of publication of this revised standard.</p>	<p>Thank you for your support.</p> <p>Products seeking connected recognition are expected to use the amended test method immediately upon finalization.</p>
Upper Compressor Cut-Off Temperature	<p>One stakeholder recommends EPA amend Table 1 to include upper compressor cut-off temperature and state that this an optional requirement</p> <p>One stakeholder is opposed to adding the upper compressor cut-off temperature, even as optional.</p>	EPA has retained the upper compressor cut-off temperature as an optional reporting field and has added it to Table 1. [DA1]

<p>Gas Heat Pumps</p>	<p>One stakeholder is interested in in developing levels for gas heat pump water heaters as they become more available in the near future.</p> <p>Several stakeholders noted that the commercial development of gas heat pump water heaters will be impacted by the outcome of this specification. Many are wary of the potential future sunset of gas products because of the potential that gas heat pump water heaters could add to the market.</p>	<p>EPA remains interested in the potential of gas water heaters with greater than 100% efficiency and looks forward to their entry into the market and their recognition as ENERGY STAR. However, it remains unclear whether there will be a large market for these products in a decarbonized economy.</p>
<p>Other</p>	<p>One stakeholder recommends ENERGY STAR® drop the “or” in line 305.</p> <p>One stakeholder suggested these minor edits to the specification:</p> <ul style="list-style-type: none"> - Section 4.D.b “CPWH” is used instead of “CWHP” which is the correct abbreviation for “connected water heater product.” - Appendix B has several broken links. 	<p>EPA will maintain the possibility for products to certify as connected with only OpenADR compliance. We appreciate having the mistakes in section 4.D.b and Appendix B pointed out and have corrected them.</p>
<p>Gas Instantaneous UEF Criteria</p>	<p>One stakeholder recommends that the ENERGY STAR requirements for residential gas-fired instantaneous water heaters be divided by draw pattern.</p>	<p>EPA considered this option for the Final Draft but ended up deciding that it would erode differentiation too much, despite its technical merit. EPA maintains the final draft criteria.</p>