



GE APPLIANCES
a Haier company

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Via E-mail (WaterHeaters@energystar.gov)

Ms. Abigail Daken
Manager, ENERGY STAR HVAC Program
ENERGY STAR Labeled Products
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Re: ENERGY STAR Program Requirements, Product Specification for Residential
Water Heaters, Version 4.0, Draft 1

Dear Ms. Daken:

GE Appliances, a Haier company ("GEA"), respectfully submits the following comments to the Environmental Protection Agency ("EPA") in response to the EPA's Request for Information on ENERGY STAR Product Specifications for Residential Water Heaters, Version 4.0, Draft 1.

GEA is a leading, US manufacturer of home appliances and equipment. GEA offers a full suite of major appliances across seven brands, a full suite of space conditioning products to the residential and commercial market and has reentered the residential water heater market. GEA has been a participant in and contributor to the ENERGY STAR program since its founding almost 30 years ago. GEA devotes substantial resources to the development of new technologies to increase energy efficiency and engineering products to meet demanding ENERGY STAR specifications.

GEA supports the December 9, 2020, comments submitted by the Air-Conditioning, Heating, and Refrigeration Institute ("AHRI") except those regarding sunseting of the specification for gas storage water heaters. GEA submits these additional comments to provide company specific information and to address issues of particular importance to GEA.

(1) EPA Should Create Additional UEF Specification Categories for Heat Pump Water Heaters

Just as EPA has set separate standards for medium and high draw patterns for gas fired storage water heaters it should do so for heat pump electric storage water heaters. The current proposed UEF standards for heat pump water heaters have a lower UEF requirement for tank sizes over 55 gallons than for tank sizes 55 gallons or smaller. Given that units with larger tank sizes are likely to have higher draw patterns, the lower UEF requirement is not supported by the engineering principles behind the draw patterns or UEF measurements.

A product with a higher draw profile more easily reaches a higher UEF. As noted, products with larger tanks are more likely to have a higher draw profile. Therefore, a lower UEF requirement for larger tanks is inappropriate. To address this issue, EPA should set UEF standards based on draw profile in addition to tank size. This is exactly what EPA has done for gas storage water heaters, and it is what EPA should do for electric storage water heaters.

(2) EPA Must Ensure it Does Not Exclude 120V Heat Pump Water Heaters from the ENERGY STAR Program

Heat pump water heaters powered with 120 volts are an important potential addition to the heat pump water heater market and are under development by manufacturers. The state of California, in particular, is leading efforts for the development of this product category. Given that the purpose of this product category is to act as an energy conservation leader, it would be unfortunate if such a product category were unable to use the ENERGY STAR mark. GEA requests that the ENERGY STAR program address this issue by establishing a separate set of ENERGY STAR UEF standards for 120V heat pump units.

(3) GEA Supports Sunsetting ENERGY STAR for Gas Storage Water Heaters After Product Specification Version 4.0

In section 7(C) of the draft specification, EPA raises the potential for sunsetting the gas storage water heater product category from the ENERGY STAR program. While GEA supports the proposed standards in the draft version 4.0 specification for gas storage water heaters, GEA also believes that the ENERGY STAR program should be sunset for gas storage water heaters in any future specification. Gas storage water heaters are nearing their theoretical efficiency limits, and the ENERGY STAR program has limited ability to drive any further meaningful energy efficiency improvements or consumer savings in this product category.

Finally, GEA notes that the UL Standard reference under safety requirements for heat pump water heaters should be updated to include UL 60335-2-40 as an alternate to UL

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1995, given future regulatory safety requirements for all HVAC products to be certified to this new standard by Jan.1, 2024.

GEA appreciates the opportunity to provide these comments. Please do not hesitate to contact me with any questions or concerns.

Very truly yours,



John T. Schlafer