

U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460

June 24, 2022

RE: ENERGY STAR Version 5.0 Residential Water Heater Specifications

The North American Gas Heat Pump Collaborative (Collaborative) is made up of 14 gas and dual fuel utilities and energy efficiency organizations who recognize gas heat pump technologies play an important role in decarbonization. Our members represent over 22 million customers in the US and Canada, focusing on diverse solutions to equitably decarbonize with considerations for local and regional policies, climate, customer affordability, existing infrastructure, and grid composition to maximize carbon emissions reductions. The Collaborative's mission is to accelerate the adoption of innovative technologies that advance energy efficiency and facilitate decarbonization in North America's gas network through market transformation initiatives. We are working to accelerate commercialization of gas heat pump water heater technology that exceeds efficiencies of 100%/UEF 1. As part of this, we recognize the influential role ENERGY STAR has in both development and adoption of efficiency technologies.

The recent proposal by ENERGY STAR to lower its proposed Uniform Energy Factor (UEF) level for gas storage water heaters to condensing-equivalent level, hamstrings industry efforts to commercialize efficient gas heat pump technologies that offer critically needed near-term decarbonization and cost-efficient energy savings for consumers.

The Collaborative recommends EPA to consider a tiered approach to the criteria for gas storage water heaters. By adopting two tiers that require gas storage water heaters with UEF ratings between 0.68 and 1.0 for Tier 1 and a second tier (Tier 2) that requires a UEF of >1.0, EPA can provide a critical opportunity to drive commercialization of efficient residential gas technology providing significant cost-effective energy savings. In 2009, the ENERGY STAR Residential Water Heater Specification V1 set a path towards a technology that had not yet entered the market- electric heat pump water heaters. This strategy worked, and within a short time all major manufacturers had qualified products available. We encourage EPA to do the same with gas technology.

Gas heat pump water heaters are over 100% efficient, and compatible with low carbon fuels such as Renewable Natural Gas and hydrogen. This technology is critical for decarbonization and goes the extra step to ensure communities are not left behind by providing affordable and accessible solutions that do not require expensive upgrades to existing infrastructure. Gas heat pump technology will help maintain a diversified, equitable, affordable, resilient, and energy efficient pathway to decarbonization.

Thank you again for the opportunity to submit comments on this draft specification. Please contact Corey Grace (cgrace@resource-innovations.com) with questions about our comments.

Sincerely,



James J. Jerozal Jr., Director of Energy Efficiency Strategy, Nicor Gas
Chair, North American Gas Heat Pump Collaborative

Members of the Collaborative

Interest in the Collaborative is strong and we will soon represent 33% of residential gas customers in North America.

- APGA Research Foundation
- CenterPoint Energy
- Enbridge Gas
- FortisBC
- Intermountain Gas Company
- National Fuel
- New Jersey Natural Gas
- Northwest Energy Efficiency Alliance
- Northwest Natural Gas
- Peoples Gas & North Shore Gas
- Southern California Gas Company
- Southern Company Gas
 - Atlanta Gas Light
 - Chattanooga Gas
 - Nicor Gas
 - Virginia Natural Gas
- South Jersey Industries
 - Elizabethtown Gas
 - South Jersey Gas
- Spire Energy