

November 5, 2021



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

RE: ENERGY STAR® Draft 1 Version 5.0 Specification for Water Heaters

Dear Ms. Daken:

Thank you for allowing the Northwest Energy Efficiency Alliance (NEEA) the opportunity to comment on Draft 1 Version 5.0 of the ENERGY STAR® Residential Water Heater Specification released October 5, 2021.

NEEA is a non-profit organization working to encourage the development and adoption of energy-efficient products and services. The Northwest's utilities, public benefits administrators, state governments, public interest groups, and efficiency industry representatives support NEEA. This unique partnership has helped make the Northwest region a national leader in energy efficiency. NEEA has a strong interest in promoting all aspects of energy efficiency and ancillary services that will promote energy efficiency, grid efficiencies, and energy reliability.

NEEA is currently working with efficiency organizations and manufacturers in collaborative partnerships to improve the efficiency of the water heating market. Efficiency matters, regardless of fuel type. It is crucial to consumers, utilities, the market, and the ENERGY STAR® brand to have ENERGY STAR® electric and gas water heaters available on an ongoing basis.

NEEA supports advancing energy efficiency of gas water heaters. ENERGY STAR®'s Draft 1 Version 5.0 Specification for Water Heaters represents a significant opportunity as well as a challenge to the market to deliver gas-fired storage water heater products meeting the new criteria of UEF >1 within the next 14 months.

NEEA looks forward to continued partnerships with ENERGY STAR®, manufacturers, utilities, and other stakeholders helping achieve this goal.

Additionally, in EPA's October 13, 2021 webinar, content related to "Version 5.0 Revision Drivers" referenced EPA being "unable to find a cost-effective level that provides meaningful differentiation" in the gas-fired storage category. The Northwest Power and Conservation Council's Regional Technical forum has identified multiple cost-effective gas water heater measures¹, with one specific to gas-fired storage water heaters. NEEA recommends EPA review these findings when considering elimination of cost-effective tiers.

NEEA has no additional comments related to electric water heaters, as referenced in ENERGY STAR®'s Draft 1 Version 5.0 Specification for Water Heaters.

¹ <https://rtf.nwccouncil.org/measure/residential-gas-water-heaters-0>

Please contact Aaron Winer at NEEA (contact information below) with questions about our comments and suggestions.

Sincerely,



Aaron Winer
SENIOR PROGRAM MANAGER

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