

March 4, 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 4.0 Specification for Water Heaters**

**Dear Ms. Daken:**

**NEEA would like to state its support for EPA's decisions regarding:**

- 1) Increasing UEF requirements for electric water heaters,
- 2) Requiring the same UEF performance for integrated heat pump water heaters regardless of tank size,
- 3) Adding separate classifications and UEF requirements for 120V/15A-circuit integrated HPWH and split-system HPWH,
- 4) Adjusting FHR requirement for electric water heaters, and
- 5) Limiting the duration of a consumer override of a demand response event.

**NEEA would like to reiterate our recommendation that the open-standard CTA-2045 communications *port* be required for the optional Connected rating.**

The current draft requires an open-standard communications *protocol*, but it would still allow manufacturers to use a proprietary physical communications port design. Requiring an open-standard physical connection ensures that a manufacturer's products can continue to function as connected without a particular manufacturer's continued support for its non-standard port design. This will help ensure that communication features can be reliably accessed when needed for grid stability, integration of renewables, and resiliency, today and over the product lifetime.

This requirement has been adopted or is being adopted by a number of agencies, including the states of California, Oregon, and Washington; Advanced Water Heating Initiative (AWHI); Air-Conditioning, Heating, & Refrigeration Institute (AHRI) Standard 1430; and NEEA. Most manufacturers of connected water heaters are likely meet the open-standard CTA-2045 communications port requirement if it is adopted for ENERGY STAR.

NEEA has recently learned that many stakeholders (including leading water heater manufacturers, UCM manufacturers, Lawrence Berkeley National Lab (LBNL), and the OpenADR Alliance) are unaware of any small end point loads that use OpenADR. Given this circumstance, we suggest that the specification limit its requirements for DR communication and equipment performance standards solely to CTA-2045 alone.

**NEEA would like to request that EPA reconsider allowing the *voluntary* reporting of heat pump water heater efficiency at ambient temperatures of 50 °F and/or 95 °F.**

EPA expresses concern about the burden on manufacturers of requiring information which they do not already have on hand. Voluntary reporting does not add such a burden. Additionally, NEEA can report that the majority of HPWH manufacturers have these data available to report to EPA. NEEA itself records the results of these tests as part of the product certification process for the Advanced Water Heating Standard (AWHS).

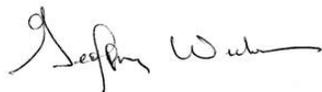
EPA notes that it will reconsider adding this reporting based on market changes. Beginning to collect the information on a voluntary basis now will provide EPA with more data to make that determination in the future. Further, utilities will be able to leverage the voluntarily reported information to design incentives that will encourage adoption of higher efficiency water heaters within their markets; knowledge of the full range of performance characteristics enables utilities to offer suitable consumer rebates and to integrate such activities into their resource plans. Additionally, knowing the actual efficiency of technologies helps utilities with resource planning and grid stability, especially in areas with warmer operating conditions that have high saturations of electric resistance water heating.

**NEEA would like to reiterate our recommendation that EPA consider all available gas water heating technologies when considering sunseting these product categories and integrate criteria for gas storage water heaters with a UEF > 1 in future specification revisions.**

As NEEA and our partners develop products and the market for gas storage water heaters with a UEF >1, we look forward to working with EPA and other stakeholders to consider all available efficient gas water heating technologies and their impacts on savings potential and consumer payback when considering sunseting these product categories. Maintaining a connection between ENERGY STAR and efficient gas water heaters is crucial to driving adoption of technologies coming to market within the next two to three years.

For questions about NEEA's comments and suggestions, please contact Geoff Wickes (electric) or Noe Contreras (gas) via their contact information below.

Sincerely,



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