



Abigail Daken, Manager
ENERGY STAR HVAC Program
US Environmental Protection Agency Office of Air and Radiation
1200 Pennsylvania Avenue NW
Washington, DC 20460

May 17, 2019

Ms. Daken,

Northeast Energy Efficiency Partnerships (NEEP) appreciates the opportunity to provide comments to the ENERGY STAR program on the V3.3 proposed specification change for ENERGY STAR water heaters. NEEP is thrilled that EPA is taking up the integration of optional connected criteria in the water heater specification.

In general, NEEP is very supportive of this effort. NEEP applauds EPA's commitment to harmonize with existing efforts in the connected water heater space. The ability for water heaters to be connected and have remote control will significantly improve the carbon impacts of water heating, allowing for alignment of water heating energy use with renewables on the grid, as well as load flexibility at time of peak demand.¹ In this case, there is not a need for a tradeoff with the efficiency requirements of ENERGY STAR.

The proposals that EPA has put forward successfully meet the objections of transparency and open standards when possible, maintaining system integrity, and meeting energy efficiency needs—particularly regarding demand response. We feel EPA has established good criteria for connected water heaters and look forward to the associated test procedure development process.

Finally, we'll note that NEEP recently released a report that touches on the role of connected water heaters in homes of the future and provides some resources and summaries of efforts and options available.² ENERGY STAR is and must continue to serve in a leading role in recognition of high performing products, and NEEP looks forward to continuing to support ENERGY STAR's efforts into the future. Please don't hesitate to contact us with any follow up questions or clarifications.

Sincerely,

A handwritten signature in black ink, appearing to read 'Claire Miziolek', with a horizontal line extending to the right.

Claire Miziolek
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¹ Established by the Regulatory Assistance Project, 1/30/2019, <https://www.raponline.org/knowledge-center/beneficial-electrification-of-water-heating/>

² The Smart Energy Home: Driving Residential Building Decarbonization, <https://neep.org/smart-energy-home-driving-residential-decarbonization>, pages 27 and 52-53