



NYSERDA

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June 24, 2022

Ms. Abigail Daiken, ENERGY STAR HVAC Program
Via: WaterHeaters@energystar.gov
United States Environmental Protection Agency (EPA)
Washington, DC 20460

NYSERDA Comments on final draft of the ENERGY STAR Version 5.0 Residential Water Heaters specification

Dear Ms. Daiken:

The following comments are submitted on behalf of the New York State Energy Research and Development Authority (NYSERDA). NYSERDA is a public benefit corporation and offers information and analysis, innovative programs, technical expertise, and support to help New Yorkers increase energy efficiency, save money, use renewable energy, and reduce reliance on fossil fuels. NYSERDA's mission is to advance clean energy innovation and investments to combat climate change, improving the health, resiliency, and prosperity of New Yorkers and delivering benefits equitably to all. NYSERDA works to help implement New York State's nation-leading climate agenda, which is the most aggressive climate and clean energy initiative in the nation; New York is advancing an orderly and just transition to clean energy that creates jobs and continues fostering a green economy as our communities continue recovering from the COVID-19 pandemic.

The market transformation of water heaters plays a critical role in helping New York achieve its decarbonization goals. NYSERDA recognizes the Environmental Protection Agency (EPA) and the ENERGY STAR program's success thus far in blazing the trail for heat pump water heaters (HPWH). NYSERDA has been promoting the HPWH market for over a decade.¹ NYSERDA is supportive of the advancements in both HPWH and connectivity that ENERGY STAR finalized earlier this year with the Version 4.0 Specification.

Thank you for the opportunity to submit comments to the EPA on the Version 5.0 draft specification for water heaters. We applaud EPA for promptly revisiting the water heater specifications for gas products. The significant increase of the gas water heater levels in the final specification is a step in the right direction, though for subsequent revisions, NYSERDA recommends EPA to consider the parity of efficiency across fuels. As New York along with EPA seek to decarbonize the water heater market, we believe that ENERGY STAR's guiding principles support sunseting ENERGY STAR recognition for gas water heaters until or unless the gas market can offer products that are comparable in

¹ Details at <https://cleanheat.ny.gov/heat-pump-water-heaters/>

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efficiency to electric storage HPWHs.² EPA has stated in the ENERGY STAR Version 5.0 Residential Water Heaters Final Draft Specification Memo³ that they are proposing “a Uniform Energy Factor (UEF) equivalent to high efficiency condensing levels for all gas products.” Condensing gas water heaters represent an increase in efficiency, but HPWHs can be more than four times more efficient than condensing gas-fired water heaters⁴ while emitting much less carbon. Given the significant emissions reduction possible from the use of electric HPWHs over gas water heaters at any UEF, NYSERDA recommends EPA sunset both the storage and instantaneous gas water heater programs upon the next revision.

Thank you for the opportunity to provide comments on the Version 5 Final Draft Water Heater specification. NYSERDA seeks to be a strong partner of EPA as we work together to advance state and national decarbonization priorities. Please do not hesitate to reach out to discuss these matters further.

Sincerely,



Chris Corcoran
Team Lead – Codes, Products, & Standards
New York State Energy Research and Development Authority (NYSERDA)

² <https://www.energystar.gov/products/how-product-earns-energy-star-label>

³ <https://www.energystar.gov/sites/default/files/ENERGY%20STAR%20Version%205.0%20Residential%20Water%20Heaters%20Final%20Draft%20Specification%20Cover%20Memo.pdf>

⁴ The DOE CCMS databased has storage HPWHs with a UEF up to 4, while the highest UEF of a storage gas water heater is 0.9