

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

November 10, 2021

RE: ENERGY STAR Draft 1 Version 5.0 Residential Water Heater Specifications

Thank you for allowing the North American Gas Heat Pump Collaborative (“Collaborative”) the opportunity to comment on the Draft 1 Version 5.0 of the ENERGY STAR Residential Water Heater Specification released October 5, 2021.

In late 2019, fourteen natural gas utilities and program administrators formed the Collaborative. These organizations are listed at the end of this letter and represent one-third of US and Canadian households that have gas service. Collaborative members have supported activities to develop gas heat pump technology, and they now see the opportunity to start conditioning the market and designing incentive programs that will accelerate market adoption when the products become widely available.

The mission of the Collaborative is to accelerate the adoption of innovative gas technologies that facilitate the decarbonization of North America’s gas network through market transformation initiatives. The Collaborative is committed to making highly efficient gas technologies with efficiencies over 100% standard practice. In general, we plan to do this by developing utility programs, supporting manufacturers and trade ally networks, advancing codes & standards, and creating common messages and specifications.

The energy savings potential and greenhouse gas reduction effects of GHP technology is of significant importance and interest to the Collaborative utilities. Gas heat pumps have efficiencies greater than 100%, result in less cost to society than reducing GHG with other technologies and offer resilient functionality. In addition, fuel diversity is important for a stable, low-cost energy future. The areas of focus for the Collaborative are priming the market for GHP water heaters and residential combination (space and water heating) units. The Collaborative has supported the Consortium for Energy Efficiency (CEE) as they have begun integrating performance tiers reflective of GHP technologies in their Residential HVAC and Water Heating specifications.

We encourage EPA to consider the following general comments for inclusion in the ENERGY STAR Residential Water Heater Specification Version 5.0:

- The Collaborative supports driving development and adoption of energy efficient gas water heaters.
- Draft criteria for Gas-Fired Instantaneous Water Heaters will successfully influence consumers to choose the most efficient versions of that technology currently on the market.
- There are currently no gas-fired storage water heaters with a UEF >1 on the market, draft criteria in Version 5.0 represents a significant opportunity as well as a challenge to the market to deliver products with a UEF >1 within the next 14 months.

- The Collaborative looks forward to continuing to partner with ENERGY STAR®, manufacturers, and other stakeholders to help achieve this goal.
- 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.

In addition to our comments above, we note that the EPA references 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 (RTF) has identified multiple cost-effective gas water heater measures¹, with one specific to gas-fired storage water heaters. The Collaborative recommends EPA review these findings and retain the ENERGY STAR® label for cost-effective, market available gas-fired storage water heaters.

Thank you again for the opportunity to submit comments on this draft specification. Please contact Molly Garcia (mgarcia@resource-innovations.com) at Resource Innovations 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

- ATCO
- Enbridge Gas Inc.
- FortisBC
- Intermountain Gas Company
- APGA Research Foundation
 - 155 Municipal Natural Gas Utilities
- National Fuel
- New Jersey Natural Gas
- Northwest Energy Efficiency Alliance
 - Northwest Natural Gas
 - Avista
 - Cascade Natural Gas
 - Puget Sound Energy
- Energy Trust of Oregon
- ONE 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

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