



September 5, 2012

Abigail Daken
Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460

Re: Draft 1 ENERGY STAR[®] Version 1.0 Commercial Water Heater Specification

Dear Ms. Daken:

On behalf of Bradford White Corporation (BWC), I would like to express our appreciation for the opportunity to comment on this framework for the Draft 1 ENERGY STAR Version 1.0 Commercial Water Heater Specification. Please find our comments below.

BWC does not agree with splitting up commercial water heaters into different ENERGY STAR programs based upon their application. This will cause confusion in the marketplace, as most consumers are not well versed in the different ways products are certified. We recommend that all gas water heaters greater than 75,000 Btu/hr be considered commercial and included in this specification. This is also consistent with the test procedures currently in place.

The proposed minimum input rate for commercial heat pump water heaters (HPWH) was 1.6 kW, which we do not feel is appropriate. Most of the residential HPWHs currently available would comply with this requirement. BWC recommends that the split be at 6 kW. Any HPWH above this level would be considered commercial and everything else would be residential.

BWC does not agree with commercial oil fired water heaters from being excluded from this specification. While there are no products that are significantly different compared to standard products, inclusion into this program will give opportunity for such products.

BWC recommends the minimum thermal efficiency level be changed to 92% for gas fired water heaters. This would encompass the typical top 25% of the market that EPA prefers and is a drastic improvement from what currently exists.

For the warranty requirements for HPWHs, BWC feels it is too premature to be setting these requirements. Until a test procedure is finalized and efficiency requirements are set, it is unknown whether the proposed 5 years (for the compressor) and 2 years (on other parts) is

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appropriate, as the components required to achieve these levels may be more reliable than expected.

Bradford White Corporation thanks you for this opportunity to comment on the Draft 1 ENERGY STAR Version 1.0 Commercial Water Heater Specification. AHRI has our full support in submitting their separate comments.

Respectfully Submitted,

Bradford White Corporation

Michael W. Gordon
Senior Vice President, Engineering

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