

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



OFFICE OF  
AIR AND RADIATION

November 8, 2011

Dear ENERGY STAR® Water Heaters Stakeholder or Other Interested Party:

The U.S. Environmental Protection Agency (EPA) welcomes your input on the attached Draft 2 Version 2.0 ENERGY STAR Water Heaters specification. Stakeholders are encouraged to submit comments on this Draft to EPA no later than **December 2, 2011**.

The Draft 2 specification was developed based on comments received on the Draft 1 specification as well as subsequent stakeholder discussions and research. The following key changes were made to the Draft 2 version:

- **Scope.** Scope of the included products has been updated to remove the mention of “for sale in the residential market only” to avoid unintentionally restricting residential water heaters used in commercial settings.
- **Whole-Home Electric Units.** Two additional requirements have been proposed for the whole-home electric units, based on the Northern Climate Specification for Heat Pump Water Heaters. They are an audible alert when the compressor turns off due to a blockage in the condensate drain, and manufacturer reporting in product literature of the lower compressor cut-off temperature.
- **Point-Of-Use (POU) Electric Units.**
  - EPA proposes a higher low flow rate requirement for higher input POU units to prevent scalding risk.
  - EPA proposes defining POU units as up to 25kW input rate and 20 gallons capacity. The capacity limit replaces a physical size limit, in order to ensure only true POU units are included.
- **Whole-Home Gas Storage Warranty.** EPA proposes a warranty requirement of 6 years for these products instead of 8 years as originally proposed. Upon consideration of information provided in response to Draft 1, EPA believes a 6 year warranty provides sufficient assurance of product performance
- **Whole-Home Gas Tankless.** Reference to the safety standard Z21.10.1/CSA 4.1 has been removed, as all instantaneous gas tankless products are covered under ANSI Z21.10.3/CSA 4.3 standard
- **Effective Date.** In anticipation of a January 31, 2012 completion date for the specification development process, an effective date of November 1, 2012 is noted.

More details regarding EPA's rationale for proposing these changes are included in note boxes throughout the draft 2 specification document.

While they remain a part of this draft, EPA is reconsidering the inclusion of POU units and add-on heat pump units. The purchase decision around POU heaters for residential use is complex, with many different scenarios and choices of type of product to use. For these reasons, EPA believes consumers may be better served by a consumer education approach rather than by a binary label. For add-on heat pumps, stakeholders expressed concern that their installation would void the UL safety certification of the original tank. Unless this issue is satisfactorily resolved, EPA will not include add-on heat pump water heaters in this specification. EPA continues to work with stakeholders on both of these issues. EPA also continues to work with solar water heater manufacturers to understand whether ENERGY STAR labeling brings value to this market.

#### **Comment Submittal**

Stakeholders are encouraged to provide written comments for EPA consideration to [Waterheaters@energystar.gov](mailto:Waterheaters@energystar.gov) by **December 2, 2011**. All comments will be posted to the ENERGY STAR Product Development Web site unless the submitter requests otherwise.

#### **Stakeholder Meeting**

EPA is hosting a face-to-face Water Heater stakeholder meeting on November 10, 2011, from 1:30 pm to 3:30 pm, Eastern Time at The Westin Charlotte, Charlotte, NC. This meeting is scheduled in conjunction with the 2011 ENERGY STAR Partner Meetings. Please RSVP to [Waterheaters@energystar.gov](mailto:Waterheaters@energystar.gov) by November 8, 2011 to indicate your interest in attending the Water Heaters stakeholder meeting. For those who are unable to attend the meeting in person, webinar and conference call capabilities will be available.

To track EPA's progress in revising the ENERGY STAR Water Heaters specification, visit the Product Development Web site at [www.energystar.gov/revisedspecs](http://www.energystar.gov/revisedspecs) and click on "Residential Water Heaters".

EPA appreciates the feedback received thus far and looks forward to continuing to work with all stakeholders to finalize the ENERGY STAR Version 2.0 Water Heaters specification. Please direct any specific questions to Abigail Daken at EPA, [daken.abigail@epa.gov](mailto:daken.abigail@epa.gov) or 202-343-9375 and Craig Haglund, D&R International, at [chaglund@drintl.com](mailto:chaglund@drintl.com) or 301-588-9387. Thank you for taking the time to review this draft specification. I look forward to working with you over the next few months.

Sincerely,



Abigail Daken  
ENERGY STAR Water Heater Program Manager  
U.S. Environmental Protection Agency