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Ms. Abigail Daken
ENERGY STAR Water Heater Program Manager
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue N.W.
Washington DC 20460

Dear Abigail:

I have the following comments on the Final Draft Version 3.0 specifications for the ENERGY STAR Program for residential water heaters.

I would once again like to reiterate that ENERGY STAR should focus on energy efficiency and any warranty requirements should be eliminated from the specification as they have no bearing on energy savings. ENERGY STAR specifications for other HVAC products such as gas furnaces, central air conditioners and boilers have only a requirement for a limited warranty, no term specified, or no requirements at all.

In the Final Draft Version 3.0 ENERGY STAR has made revisions to the warranty requirements for gas instantaneous water heaters to align them with storage tank products. The current warranty requirements for gas instantaneous water heaters are 10 years for the Heat Exchanger and 5 years for parts and have been changed to 6 years on the system which increased the warranty requirements for parts. In this attempt to align warranties you have eliminated all gas instantaneous water heaters from the program as the new warranty requirement is beyond anything currently offered on the market. I do not believe it was ENERGY STAR's intention to increase the warranty requirements for gas instantaneous water heaters and would ask that the parts warranty be returned to the current specification.

The ENERGY STAR mark is synonymous with energy savings and identifying high efficiency products. It is clear that since ENERGY STAR created a program for water heaters that the adoption rate of high efficiency products has increased.

I would also like to ask ENERGY STAR to once again review the Energy Factor requirements for gas instantaneous water heaters which I believe have been set too high and are quickly forcing this advanced water heating product towards maximum technology even though they are significantly more efficient than the efficiency level which has been set for gas storage water heaters. As I have commented on the previous Draft 1 Version 3 specification a gas instantaneous water heater meeting the DOE federal minimum efficiency level which is an EF = 0.82 is 18% more efficient than an ENERGY STAR rated gas storage water heater.

Website: www.rinnai.us

Understanding that ENERGY STAR has decided to follow the DOE in segmenting water heater products by technology and have proposed setting different efficiency levels for products that accomplish the same function (heating water) for consumers, I would ask that you, at a minimum, consider a lower efficiency level. I would suggest that EPA consider an approach that would be consistent with the direction you have taken on gas storage water heaters > 55 gallons. The proposed ENERGY STAR specification for gas storage water heaters > 55 gallons acknowledges that this is an advanced water heating technology and has set the specification for energy factor at 0.77 which is 2 points higher than the DOE federal minimum efficiency. Understanding that I still support a single efficiency level for all gas water heaters then I would ask EPA to at least consider setting the energy factor level for gas instantaneous water heaters at 0.84.

EPA has already indicated that it may consider a technology neutral approach in future specifications and this proposal would more closely align the efficiency requirements for advanced water heating technologies making it easier to achieve this goal. In addition it would provide an opportunity for manufacturers to improve existing ENERGY STAR rated gas instantaneous water heaters with an EF of 0.82 with the potential of achieving the new requirements.

Thank you for allowing me to comment on the proposed Version 3.0 specification for residential water heaters. If you have any questions concerning my comments feel free to contact me.

Respectfully submitted,

James York
Vice President of Engineering
Rinnai America Corporation