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September 19,

ENERGY STAR® for Commercial Water Heaters 1.0: Draft 1 – Comments – AOS

A.O. Smith Corporation is a leading manufacturer of residential and commercial water heating products, and is an ENERGY STAR Partner. We appreciate the opportunity to comment on the ENERGY STAR Product Specification for Commercial Water Heaters, Eligibility Criteria, Version 1.0: Draft 1.

We applaud and appreciate EPA's efforts to include commercial water heaters in the ENERGY STAR program, and support the overall provisions in draft 1. We do, however, have some comments on specific portions of the specification, as follows:

- Line 21 – 23: The maximum current and voltage ratings for heat pump water heaters of 24 A. and 250 V., respectively, is not correct for commercial (EPACT-covered) equipment. The 24/250 limitation is actually from the NAECA scope for electric water heaters (10CFR430, not 10CFR431). We suggest that the appropriate wording for the definition is simply "... with an input rate greater than or equal to 1.6 kW."
- Line 26: While the phrase "... , and that is industrial equipment, ..." is appropriate and consistent with EPCA definitions, it may be less confusing to go ahead and say that it applies to gas instantaneous heaters with an input greater than 200,000 Btuh. That way, no one will need to refer to EPCA in addition to the Specification, and any confusion over what "industrial" means in this context will be avoided.
- Lines 85 – 87: We concur with EPA's position that water-source heat pump water heaters that operate using a working fluid from HVAC systems, and not sold as a single system, are not combination space and water heating products.
- Table 1: We support the proposed criteria for qualified gas water heaters.
- Table 2: We support the concept of making provisions for qualified electric water heaters, and populating the requirement levels when a suitable test method is available.
- Line 167 – 170: We suggest that when warranty criteria is developed for qualified electric water heaters, the appropriate levels should be 5 years/compressor, 3 years/tank (if the heater has a tank), and 1 year/parts. These levels are consistent with the gas heater criteria on the tank and parts, and with commercial space-heating heat pumps on the compressor and parts. Since the parts (including the compressor) used in commercial water-heating heat pumps are essentially the same technology, if not the same components, used in space-heating heat pumps, we believe the same warranty periods are appropriate.
- Line 200: We concur with the proposed rounding requirements.
- Line 239: We applaud EPA's efforts to finalize this specification in December, 2012, and are very supportive of the immediate effectivity provision. Several manufacturers have commercial water heaters that will comply with these criteria, and will be able to move quickly to obtain approval to get ENERGY STAR labeled products on the market.

As a general comment, we also agree with EPA's logic (as explained in the specification cover letter) for not including POU and solar commercial water heaters at this time.

Thank you again for the opportunity to provide input regarding the program requirements, and feel free to contact me if you have additional questions, or would like clarification on any of our comments.

Regards,

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