



July 1, 2014

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

Re: ENERGY STAR® Final Draft Version 3.0 Residential 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 the ENERGY STAR Final Draft Version 3.0 Residential Water Heater Specification. Please find our comments below.

BWC reaffirms its support with EPA's decision to align the product categories with how the products will be segmented (e.g. splitting gas and electric storage at 55 gallons) due to NAECA III, which comes into effect on April 16, 2015.

We appreciate the willingness to lower the EF level for gas storage water heaters greater than 55 gallons to 0.77, though we still believe the level should be volume corrected regardless of what test procedure is used.

For Light Duty EPA covered gas water heaters, the EPA states that a manufacturer has the option of raising a water heater's thermal efficiency instead of lowering the standby loss. BWC believes that volume correction should be taken into account also. When considering the typical size of the water heaters that fall into category, they are at a greater disadvantage given their surface area. Also, their tank construction to achieve the thermal efficiency required is a hindrance, especially when compared to other water heaters not in this category.

Bradford White Corporation thanks you for this opportunity to comment on the Final Draft ENERGY STAR Version 3.0 Residential Water Heater Specification. We have coordinated our comments with AHRI.

Respectfully Submitted,

Bradford White Corporation

Eric Truskoski
Engineering Manager – Product Development

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