



April 29, 2014

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

Re: ENERGY STAR® Draft 1 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 Draft 1 Version 3.0 Residential Water Heater Specification. Please find our comments below.

BWC agrees with EPA's proposal 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. And, we appreciate EPA planning to implement this specification at the same time as NAECA III to help minimize potential confusion.

Though we agree with how the products will be segmented, BWC disagrees with the proposed EF level for gas storage water heaters greater than 55 gallons. This EF level is difficult to hit with lower capacity water heaters, and the surface area of larger capacity water heaters will put it at a much greater disadvantage to obtain the proposed EF. Due to this, we believe this value should be volume corrected and lower than that proposed.

In regards to the proposed maximum standby requirements for Light Duty EPA covered gas water heaters, BWC strongly disagrees. We believe these levels to be nearly unobtainable by the size of products that fall within this category. BWC recommends that the standby loss requirements in the current Residential ENERGY STAR specification are maintained for these types of products.

BWC appreciates the EPA's efforts to incorporate more advanced technology, such as the Connected Product criteria. However, BWC believes the use of this technology on water heaters is very premature at this time, and its incorporation will provide little benefit and potentially a significant cost adder. BWC recommends that EPA pull this criteria from the specification and revisit it at a later date.

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Bradford White Corporation thanks you for this opportunity to comment on the 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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