



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

OFFICE OF
AIR AND RADIATION

December 6, 2012

Dear ENERGY STAR® Commercial Water Heater Manufacturer or Other Interested Party:

The U.S. Environmental Protection Agency (EPA) is pleased to share the Final Draft Version 1.0 ENERGY STAR Commercial Water Heater specification. EPA will accept comments on this Final Draft proposal through **December 20, 2012**. EPA would like to thank the many stakeholders who have invested time and effort to contribute feedback that has informed this product specification process. EPA anticipates completing the process and releasing the Final Version 1.0 specification near the end of December, and it will be effective immediately.

EPA received several comments about the proposed 0.94 Thermal Efficiency requirement for gas water heaters including suggestions to set the level at 0.90 or 0.92 TE. After additional analysis, EPA decided to retain the level as proposed which will result in a more favorable payback while continuing to differentiate the best performers with regards to energy efficiency. EPA also received comments on the electric heat pump water heater definition. Given that commercial and residential water heater units of all other types are distinguished primarily based on their input, EPA continues to remain interested in using the compressor and fan input power to define heat pump water heaters. EPA will participate in the Department of Energy (DOE)'s test method development and will continue to hold discussions with interested stakeholders on the appropriate definition for a commercial vs. residential product as test method development continues.

The Final Draft retains the requirements as proposed in the Draft 1 specification except for the following items:

- **Definition.** To provide clarity, EPA has added additional language to the Gas Instantaneous water heater definition that "industrial equipment" means units with an input rate greater than 200,000 Btuh.
- **Scope.** Based on stakeholder feedback, EPA has excluded water heaters with capacity >140 gals to clarify that heavy duty industrial application units are not covered under this specification.
- **Warranty.** EPA has revised the proposal for Electric Heat Pump water heater's warranty requirement, as indicated in the text box, to 5 years on the compressor, 3 years on the tank (if present), and 1 year on all other parts to match current industry practices. This is considered provisional pending finalization of the test method and efficiency requirements for electric heat pump water heaters.

EPA addresses these changes and other Draft 1 stakeholder comments within note boxes found throughout the Final Draft specification.

Comment Submittal

Any comments on the Final Draft Version 1.0 specification should be submitted to Commercialwaterheaters@energystar.gov no later than **December 20, 2012**. All comments will be posted to the ENERGY STAR Product Development website unless the submitter requests otherwise.

The exchange of ideas and information between EPA, industry, and other interested parties is critical to the success of ENERGY STAR. To track EPA's progress in developing the ENERGY STAR Commercial Water Heaters specification, go to www.energystar.gov/newspeccs and click on the Commercial Water Heaters Version 1.0 link.

Third-Party Certification

Manufacturers are reminded that as of January 1, 2011 all new products must be certified by an EPA-recognized Certification Body (CB) before being labeled and marketed as ENERGY STAR. Upon satisfactory completion of all certification requirements, a CB will notify the ENERGY STAR Partner that the product is ENERGY STAR qualified and will submit qualified product data to EPA for listing on the ENERGY STAR website. For more information on the Third-party Certification program please visit www.energystar.gov/3rdpartycert.

Please direct any specific questions to Abigail Daken at EPA, daken.abigail@epa.gov or 202-343-9375 or Sarah Medepalli, ICF International, at sarah.medepalli@icfi.com or 202-677-5201. Questions regarding test methods may be addressed to Ashley Armstrong, ashley.armstrong@ee.doe.gov or 202-586-6590. Thank you for your continued support of ENERGY STAR.

Sincerely,

A handwritten signature in cursive script, appearing to read "Abigail Daken".

Abigail Daken, Product Manager
ENERGY STAR for HVAC