Commercial Water Heater Version 1.0 Spec - Stakeholder Comments Final Draft

Topic	Comment	EPA Responses
	General	
Effective Date	Federal regulation (42 USC Section 6294a.) requires that an appropriate lead time be provided prior to the applicable effective date for a new or a significant revision to an Energy Star specification. That section further specifies that the lead time shall be 270 days, unless the Agency specifies otherwise. Accordingly, we believe that EPA must provide some time between the finalization of the specification and its implementation. We recommend that the effective date for this program be established as 9 (nine) months AFTER the finalization of the specification	As a leadership program, ENERGY STAR specifications recognize highly efficient products which are already on the market. In this case, there is a wide selection of models, from several manufacturers, that meet the requirements in the Final Draft. In the agency's judgment, new specifications do not require a transition period. This is supported by 42 USC Section 6294a, which explicitly notes that the notice is required in order to account for "...product manufacturing, product marketing and distribution processes," not implementation of efficiency improvements in existing products.
	Definitions	
Gas Instantaneous	Edit Final Draft gas instantaneous definition as: “1Ab. A gas instantaneous type unit1, with an input rating not less than 4,000 BTU/hr per gallon of stored water including products meeting this description that are designed to heat water to temperatures of 180^{o}F or higher.” There are many models of commercial gas instantaneous water heaters on the market today which are designed to heat and deliver water at a temperature of 180F or higher and which have input rates less than 200,000 Btu/h. The added modification of greater than 200,000 Btu/h disqualifies all those models from this specification.	EPA does not intend to exclude the gas instantaneous water heaters with input rates less than 200,000 Btu/h and that are designed to heat and deliver water at a temperature of 180F or higher. To allow inclusion of these units, EPA has decided to delete the language "input greater than 200,000 Btuh" from the gas instantaneous water heaters definition, and make other changes to facilitate their inclusion.
	Criteria	
Thermal Efficiency	Lower the TE criteria to a minimum of 92% which allows a majority of Manufacturer stakeholders to qualify for ENERGY STAR program which should in turn bring increased participation in the program.	EPA has decided to retain the proposed Thermal Efficiency level as proposed primarily because it most closely reflects the guiding principles of the ENERGY STAR program. EPA found little evidence of significant per-unit manufacturing or installation cost differences between units with 0.92 TE and those with 0.94 TE ratings. Also, units at 0.94TE make up an appropriate fraction of available models.
Standby Loss	Recommend to set the maximum standby loss requirement at the Federal standard level or to delete it. EPA has not provided any quantification or sensitivity analysis showing the ROI value of proposed ENERGY STAR standby loss requirement vs. what’s already required to meet Federal minimums.	The purpose of ENERGY STAR is to provide differentiation in the marketplace and adopting the federal standard level does not support this guiding principle. Thus, EPA has decided to retain the proposed standby loss requirements.
General	For program consistency and clarity between Residential and Commercial products and due to many industry stakeholders buying water heating equipment from both market segments (Residential and Commercial), recommend the establishment of separate product categories with respect to Product Performance Requirements for Gas Water Heaters, that is, separate product categories for Qualified Gas Storage Water Heaters and Qualified Gas instantaneous Water Heaters similar to what’s in place in your Residential V2.0 ENERGY STAR product specification.	In future, EPA intends to combine the gas instantaneous and gas storage categories in the residential water heater specification. This reflects the purchasing decision faced by consumers, for whom instantaneous and storage water heater provide substantially the same service. Thus, we will keep the combined category in the commercial specification. In addition, based on the market data, it appears that there is sufficient availability of both gas storage and gas instantaneous products at the proposed level of 0.94TE.
	Test Method	
Heat Pump Water Heater	Following up on the information previously provided concerning AHRI’s development of an efficiency rating method for commercial heat pump water heaters, attached a copy of that draft rating method that is currently being reviewed by AHRI Water Heater Section	Thank you for sharing the draft of the AHRI Standard 1300P - Performance rating of Commercial Heat Pump Water Heaters. This draft has been forwarded to DOE for their review.