

ENERGY STAR Commercial Water Heaters V1.0 Updated Final Draft Comment Response Summary

| Topic | Comment Summary | ENERGY STAR Response |
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| General | We continue to applaud and appreciate EPA's efforts to include commercial water heaters in the ENERGY STAR program, and are strongly in support of the Updated Final Draft of the specification as proposed on January 16, 2013. | EPA appreciates your support. |
| Scope | The ENERGY STAR label can help commercial customers identify high efficiency gas storage and tankless water heaters and fully supports the current proposal. CEE recommends that EPA only proceed when an industry accepted test method is available and sufficient data is available to analyze and then determine an appropriate performance level. | EPA appreciates your support. |
| Scope | We agree with the decision to address product performance rather than the component parts of a system. As a binary labeling tool for contained products, the application of the ENERGY STAR label on a component part of a system may have detrimental implications to the Brand promise. | EPA appreciates your support. |
| Scope | We appreciate EPA's willingness to continue the dialogue on defining covered Heat Pump Water Heaters using output capacity, and look forward to participating in that dialogue at the appropriate time. | EPA appreciates your support. |

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| Effective date | <p>Rheem ...recommends that the effective date for this program be established as 9 (nine) months AFTER the finalization of the specification.</p> <p>This will allow manufacturers to fully assess the actions that they will need to complete to qualify models and to prepare and provide market and communications support to the industry launch of the program providing ALL manufacturers with same opportunity to participate in this program.</p> <p>Further, Rheem encourages the EPA to research legislation on this matter in that ENERGY STAR® is required to provide for a 270 day minimum lead time before a new specification takes affect (42 USC 6294a). It's our understanding that the 2007 amendments to EPACT established this in law taking into account the timing requirements of the manufacturing, product marketing, and distribution processes for the specific products impacted.</p> | <p>Pursuant to 42 USC Section 6294a(c)(7), for new ENERGY STAR specifications, the Environmental Protection Agency provides appropriate lead time prior to the applicable effective date for a new or a significant revision to a product category, taking into account the timing requirements of manufacturing, product marketing and the distribution process for the specific product addressed. The specification development process typically spans 6 to 9 months and culminates with the distribution of a final draft specification four to six weeks prior to the effective date. EPA believes four to six weeks lead time is generally appropriate for new specifications, as opposed to specification changes, which require additional time for removing the ENERGY STAR label from product literature associated with products that become ineligible.</p> <p>With respect to commercial water heaters, EPA distributed the first draft specification in August, 2012 and has provided in excess of two and half months lead time since distributing the final draft specification in early December, 2012. The Agency considers this lead time appropriate for this specification in light of data demonstrating that a range of product models from multiple manufacturers already meet the new ENERGY STAR requirements.</p> |