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April 30, 2014

Ms. Abigail Daken  
ENERGY STAR Water Heater Program Manager  
U.S. Environmental Protection Agency  
Ariel Rios Building  
1200 Pennsylvania Avenue N.W.  
Washington DC 20460

Dear Abigail:

I have the following comments on Draft 1 Version 3.0 specifications for the ENERGY STAR Program for residential water heaters.

The ENERGY STAR mark is synonymous with energy savings and identifying high efficiency products. It is clear that since ENERGY STAR created a program for water heaters that the adoption rate of high efficiency products has increased.

I, unfortunately, do not agree with all aspects of Draft 1 Version 3.0 specifications that were released in April of this year. The design of the ENERGY STAR program is intended to look at products from a consumer perspective and identify high efficiency products within a defined category. From a consumer perspective, a gas water heater is a gas water heater whether or not this heated water comes from a gas storage tank or a gas instantaneous water heater. This consumer perspective supports a technology neutral approach to establishing ENERGY STAR levels, as was mentioned in the draft specification for a future revision, versus the segmentation approach being proposed. I understand that this is being done in reaction to the change in federal minimum efficiency for instantaneous gas water heaters. This, in essence, is already holding this small category of gas water heaters to a higher standard and therefore it is not reasonable to no longer identify it as a highly efficient product. In following the direction of the Department of Energy in segmenting water heaters by construction type you are now completely ignoring a group of products that are more efficient (0.82 EF) than the efficiency level you have set for gas storage water heaters (0.67 EF).

Using the DOE test procedure for calculations, a 0.82 EF instantaneous gas water heater will consume an estimated 183 therms per year. This is a savings of 18.4% over a 0.67 EF ENERGY STAR rated gas storage water heater which will consume an estimated 242 therms per year. If the ENERGY STAR program is designed to assist consumers in selecting high efficiency products how can you exclude this product just because it is already held to a higher requirement?

I would also like to comment on the warranty requirements and suggest they be removed from all models. This is inconsistent with other appliances and heating and cooling equipment covered under the ENERGY STAR specifications and is not connected to the energy savings aspect of the program.

Website: [www.rinnai.us](http://www.rinnai.us)

Thank you for allowing me to comment on the proposed Version 3.0 specification for residential water heaters. If you have any questions concerning my comments feel free to contact me.

Respectfully submitted,

James York  
Vice President of Engineering  
Rinnai America Corporation