



November 6, 2007

Mr. Richard Karney
ENERGY STAR Product Manager
U.S. Department of Energy
Washington D.C.

Dear Mr. Karney,

Bradford White has reviewed the ENERGY STAR Residential Water Heaters: Second Draft Criteria Analysis and Proposal received via email October 26, 2007. Continuing our support of the DOE effort to develop an ENERGY STAR program for residential water heaters, Bradford White respectfully submits the following comments in response to the ENERGY STAR Residential Water Heaters: Second Draft Criteria Analysis and Proposal.

Bradford White:

- Recommends ENERGY STAR criteria for condensing gas-fired water heaters include products with hourly inputs from 76,000 btu to 200,000 btu and thermal efficiencies of 90% and greater. Such products do not have Energy Factors but metrics for inclusion into the program could include thermal efficiency, as noted, and standby loss, as required for such products per ASHRAE 90.1b. As the average size of homes in America has increased rapidly in the past decade, so has the demand for heated potable water. This demand has prompted the installation of water heaters classified as commercial, such as those mentioned above, into residential applications.
- Suggests the initial Energy Factor requirement for high-performance water heaters be set at 0.62 for a period of time sufficient to allow market penetration of improved energy efficiency water heaters. Bradford White remains concerned that the increase in EF from 0.58 to 0.65 brings more challenges to the supply-chain than product availability. Key challenges which must be overcome include product price premiums due to market penetration below 30% and typical installation requirements for an EF increase of this magnitude, including electrical contract work to provide a power source near the water heater, installation of plastic venting through a roof or sidewall and closure of the unused chimney. Due to homeowner-envisioned installation hassles of 0.65 EF water heaters and the typical "emergency" circumstances for water heater replacement, we believe that the market will continue to demand water heaters which do not require external power and use existing atmospheric venting arrangements.

- Supports GAMA recommendation that ENERGY STAR criteria include a requirement that all products be listed with the applicable national safety standards.
- Does not support the exclusion of water heating technologies, i.e. oil-fired, electric or other, based on minimal energy savings per unit; such units support the national goal of reduced energy consumption when the reduction is considered for all appliances of a specific heating technology.
- Supports the inclusion of a warranty requirement but not a specified warranty period as a condition for ENERGY STAR. We believe the warranty period offered by a manufacturer is competitive and market driven. Warranty period directly impacts product price. For products with little history to draw from, the cost of a warranty to consumer can increase even more substantially. Imposing a warranty period for ENERGY STAR water heaters would therefore increase the product cost and payback period, resulting in a less marketable product. Furthermore, warranty period is not a condition for furnace, boiler or air conditioners to be ENERGY STAR branded.

Bradford White appreciates the DOE consideration of stakeholder input in the development of an ENERGY STAR program for water heaters. We look forward to continued participation in ENERGY STAR events and advancement of the program for water heaters. If you have any further questions regarding the aforementioned comments, please do not hesitate to contact us.

Respectfully,



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cc: M. Gordon
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