



June 8, 2007

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

Dear Mr. Karney,

Bradford White supports the DOE effort to develop an ENERGY STAR program for residential water heaters. We have reviewed the ENERGY STAR Residential Water Heaters: Draft Criteria Analysis, received 5/2/07 via email, and discussed stakeholder feedback and information subsequent to the June 5, 2007, stakeholder meeting in room 6E069 of the Forrestal Building. Accordingly, Bradford White respectfully submits the following comments in support of our position regarding ENERGY STAR for water heaters:

Bradford White:

- Supports the development of ENERGY STAR criteria and branding for water heaters used in residential applications.
- Supports GAMA view of identifying the top percentage of commercially available water heaters to establish the ENERGY STAR brand name in the water heater market. We further agree with the progressive approach suggested by GAMA wherein at an agreed upon date in the future the initial ENERGY STAR criteria may be phased out and replaced with criteria reflective of the available technologies of the time.
- Supports a capacity based Energy Factor requirement for tank type water heaters as opposed to a single EF. A single EF may prove biased toward smaller tank capacities not reflective of current market or lifestyle demands.
- 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.

- 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.
- Does not support the creation of ENERGY STAR criteria for products which do not exist in the marketplace today.
- Does not support the inclusion of a warranty requirement as a condition for ENERGY STAR. As noted by GAMA, furnace and boiler criteria for ENERGY STAR do not impose warranty requirements.
- Supports GAMA recommendation that ENERGY STAR criteria include a requirement that all products be listed with the applicable safety standard.
- Disagrees with the stakeholder comment that the change in cost for a 0.90 EF and 0.95 EF electric storage tank water heater is about \$20. In addition to material requirements, other costs such as logistics, distribution and warranty may affect the cost more than stated.

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 position, please do not hesitate to contact us.

Respectfully,



Ryan Ritsema
Bradford White Corporation
(269) 795-3364

Cc: M. Gordon