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Richard,

I would like to submit a few comments concerning the ENERGY STAR draft criteria for residential water heaters:

For simplicity, shouldn't all water heaters be held to the same standard level of Energy Factor? In the proposed criteria, "Advanced Non-Condensing Storage" water heaters are held to a lower standard than "Whole-Home Tankless Water Heaters" and "Gas Condensing Water Heaters". I believe that having two different efficiency levels as the criteria for an ENERGY STAR label will give a misleading signal to the public about the comparative energy savings between the three types of products. Why not set a single level for these three technologies, whether it is 0.70 or 0.80?

The requirement for 3.5 GPM at a 77° F rise for Whole-Home Tankless Water Heaters is too restrictive. Because Energy Factor is only defined for water heaters that are rated less than 199,999 Btu/h, the GPM requirement means that only products in the range of 170,000-199,999 Btu/h will be considered. Since tankless water heaters rated at greater than 200,000 Btu/h are being very frequently used in residences, why not extend this ENERGY STAR program to these larger residential tankless water heaters? Why not allow tankless water heaters that are rated greater than 200,000 Btu/h in the ENERGY STAR program as long as they are tested in accordance with the DOE method?

GAMA is currently reviewing the DOE test method for Energy Factor on tankless water heaters to determine what changes might need to be made in order to more accurately reflect actual usage. The draft criteria states that manufacturers of tankless water heaters "can produce models that meet or exceed a 0.8 Energy Factor." If the ENERGY STAR program is based on the energy factors of existing models, but the changes to the test method skew future data in one direction or another, the validity of the 0.80 threshold may be lost. I would suggest that in order to prevent this issue, the criteria be clear that the 0.80 level is according to the current DOE test method and current testing practices.

Thanks,

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