

Appliance Standards Awareness Project
American Council for an Energy-Efficient Economy
Natural Resources Defense Council

June 24, 2022

Abigail Daken
EPA Manager, ENERGY STAR HVAC Program
U.S. Environmental Protection Agency
William Jefferson Clinton Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460

RE: ENERGY STAR® Residential Water Heaters Version 5.0 Final Draft Specification

Dear Ms. Daken,

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP), American Council for an Energy-Efficient Economy (ACEEE), and Natural Resources Defense Council (NRDC) on the Residential Water Heaters Version 5.0 Final Draft Specification released on June 1, 2022. We appreciate the opportunity to comment.

We recommend that EPA maintain the Draft 1 proposed criteria for gas storage water heaters. In Draft 1 of the Version 5.0 specification for residential water heaters, EPA proposed raising the minimum UEF for gas storage water heaters to 1.0, which could be met with gas heat pump technology.¹ However, in the Final Draft specification, EPA is proposing to lower the UEF level for gas storage water heaters from a heat pump-equivalent level to a condensing-equivalent level. In our comments on the Draft 1 specification, we explained the importance of setting ambitious levels for gas water heaters to help facilitate decarbonization and meet 2050 climate goals.² Strong and immediate action on these goals is necessary, and EPA has the ability to play a key role in meeting emissions reductions targets with the ENERGY STAR program. Thus, we continue to encourage EPA to require heat pump efficiency levels for gas storage water heaters in order to foster the development and adoption of heat pump technology that advances progress on decarbonization goals. However, if EPA decides to finalize a condensing-level specification for gas storage water heaters, we urge the agency to revisit the specification and evaluate the potential for heat pump levels within a short period (i.e., 2 years).

1

https://www.energystar.gov/sites/default/files/ENERGY%20STAR%20Version%205.0%20Residential%20Water%20Heaters%20Draft%201%20Specification_5.pdf.

2

<https://www.energystar.gov/sites/default/files/ASAP%2C%20ACEEE%2C%20CEO%2C%20GECA%2C%20IPL%2C%20NYSERDA%2C%20SEEP%2C%20WSDOC%20Comments.pdf>.

Thank you for considering these comments.

Sincerely,



Kanchan Swaroop
Technical Advocacy Associate
Appliance Standards Awareness Project



Michael Waite, Ph.D., P.E.
Senior Manager, Buildings Program
American Council for an Energy-Efficient Economy



Joe Vukovich
Energy Efficiency Advocate
Natural Resources Defense Council