



December 18, 2012

ENERGY STAR® for Commercial Water Heaters Eligibility Criteria 1.0: Final Draft – Comments – AOS

A.O. Smith Corporation is a leading manufacturer of residential and commercial water heating products, and is an ENERGY STAR Partner. We appreciate the opportunity to comment on the ENERGY STAR Product Specification for Commercial Water Heaters, Eligibility Criteria, Version 1.0: Final Draft.

We continue to applaud and appreciate EPA's efforts to include commercial water heaters in the ENERGY STAR program, and are strongly in support of the Final Draft of the specification. We do have some specific comments, as follows:

- We agree with EPA's decision to maintain the gas water heater criterion at .94 TE (94%).
- We agree with the scope limitation of excluding heaters with greater than 140 gallon tank capacity.
- We appreciate EPA taking our September comments on Heat Pump Water Heater warranty into consideration, and strongly agree with that criterion as contained in the final draft.
- Line 25: While we are the commenter that suggested (in our September comments) adding the parenthetical "clarifying phrase" that the definition applies to gas instantaneous heaters with an input greater than 200,000 Btuh, we have been reminded that there can be gas instantaneous heaters designed to deliver water at a temperature at or above 180F and have inputs less than 200,000 Btuh. Such heaters would be covered under 10 CFR Part 431, and by this ENERGY STAR specification. Therefore, we would support removal of the parenthetical "(input greater than 200,000 Btuh)".
- We appreciate EPA's willingness to continue the dialogue on defining covered Heat Pump Water Heaters using output capacity, and look forward to participating in that dialogue at the appropriate time.

Thank you again for the opportunity to provide input regarding the program requirements, and feel free to contact me if you have additional questions, or would like clarification on any of our comments.

Regards,

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