



November 29, 2011

Abigail Daken
Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460

Re: ENERGY STAR® Version 2.0 Water Heater Specification, Draft 2

Dear Ms. Daken:

On behalf of Bradford White Corporation (BWC), I would like to express our appreciation for the opportunity to comment on the ENERGY STAR Version 2.0 Water Heater Specification, Draft 2. Please find our comments below.

We recommend that the definition in 1)A for a Residential Water Heater be revised to include solar energy as a source to heat potable water, in addition to gas and electricity.

BWC supports the changes made to the requirements for Point-of-Use (POU) electric water heaters. We also support maintaining the warranty for Whole-Home Gas Storage Water Heaters at 6-years. In the list of warranty requirements for gas storage water heaters, we recommend removing the term “sealed,” as there is no sealed system on a gas water heater.

While BWC agrees that add-on heat pump manufacturers must explicitly state that the installation of their product may void the water heater’s warranty, we do not agree with using an energy factor multiplier (EFM). There is no accurate way to determine what the multiplier would be for the substantial number of combinations that could exist in the field with an add-on heat pump and electric resistance storage water heater.

For integrated heat pump water heaters, BWC believes that it should only be required to have a visual alert to notify when the heat pump turns off due to a blockage in the condensate drain. By adding the requirement of an audible alert, it adds unnecessary cost to the control. In addition, users are required to perform regular checks on heat pump water heaters to ensure that the filter is not blocked. Checking the condensate line, as well as the water heater control could also be done at the same time.

BWC agrees with manufacturers having to report in their literature the ambient temperature that the heat pump will no longer operate and electric resistance operation occurs.

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BWC thanks you for this opportunity to comment on the ENERGY STAR Version 2.0 Water Heater Specification, Draft 2. AHRI has our full support in submitting their separate comments.

Respectfully Submitted,

Bradford White Corporation

Michael W. Gordon
Senior Vice President, Engineering

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