

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



OFFICE OF  
AIR AND RADIATION

August 5, 2011

Dear ENERGY STAR® Water Heaters Stakeholder or Other Interested Party:

The U.S. Environmental Protection Agency (EPA) welcomes your input on the attached Draft 1 Version 2.0 ENERGY STAR Water Heaters specification. Stakeholders are encouraged to submit comments on this Draft to EPA no later than **September 9, 2011**. The specification development process, including subsequent drafts and stakeholder comment periods, is anticipated to conclude in December 2011.

The attached Draft 1 document reflects consideration of feedback received on the framework document. We found stakeholder comments very useful, and appreciate both your thoughtful written input and participation in the webinar. To ensure that ENERGY STAR continues to distinguish top performing water heaters in terms of energy efficiency, providing energy and costs savings to the consumer, EPA is proposing revising the ENERGY STAR specification in the following areas:

- **Technology Neutral Approach.** In efforts to promote technology neutrality, allowing consumers to identify all energy efficient options that will meet their needs, EPA is proposing to categorize products by fuel source, which will include Electric, Gas and Solar water heaters. The products are further subdivided by use as whole-home water heating, and point-of-use (POU) water heating.
- **Definitions.** Definitions for Whole home units and Point-of-Use units have been added.
- **Scope.** Scope has been updated to clarify that products intended for sale in the residential market only are eligible for ENERGY STAR qualification.

**Electric**

- **Whole-Home Electric Units.**
  - **Add-on Heat Pump Units.** Heat pump water heaters would no longer be limited to integrated designs, as add-on heat pump units would be able to qualify under the proposed whole-home electric product category. Specific warranty requirements have been included for add-on heat pump units in order to protect the consumer from original tank manufacturer's warranty being canceled.
- **Point-of-Use Electric Units.**
  - **Electric Tankless Water Heaters.** Small electric tankless units would be able to qualify under the POU electric product category. Additional requirements have been proposed for these products in order to assure the consumer a reliable product which increases the performance of their current water heating and distribution system.

## Gas

- **Whole-Home Gas Units.**
  - **Gas Condensing Water Heaters.** The separate category for gas condensing water heaters has been merged with high efficiency gas storage water heaters as part of a whole-home gas storage category.
  - **Efficiency.** The EF level for whole-home gas storage units is maintained at the current high efficiency gas storage level of 0.67.
  - **Warranty.** Warranty period for whole-home gas storage units is proposed as 8 years.

## Solar

- **Solar Water Heaters.** In the framework document, EPA asked for feedback on various ways to fit solar water heaters into a technology neutral approach. In consideration of this feedback and customers' purchasing decisions, solar WH will not be merged with whole home gas and electric storage categories. In addition, their payback will be calculated, as in the past, against conventional water heaters. However, EPA remains concerned about the cost effectiveness of solar water heaters, and seeks ideas on more effective tools than labeling to encourage their adoption.

More details regarding EPA's rationale for proposing these changes are included in note boxes throughout the draft 1 specification document.

### **Comment Submittal**

Stakeholders are encouraged to provide written comments for EPA consideration to [Waterheaters@energystar.gov](mailto:Waterheaters@energystar.gov) by **September 9, 2011**. All comments will be posted to the ENERGY STAR Product Development Web site unless the submitter requests otherwise.

EPA plans to host a stakeholder webinar on **August 23, 2011** to discuss the Draft 1 specification and address initial stakeholder comments and questions. Stakeholders are encouraged to inform EPA of any industry events that may conflict with this proposed date. EPA will distribute further information about this meeting over the next two weeks.

To track EPA's progress in revising the ENERGY STAR Water Heaters specification, visit the Product Development Web site at [www.energystar.gov/revisedspecs](http://www.energystar.gov/revisedspecs) and click on "Residential Water Heaters".

EPA appreciates the feedback received thus far and looks forward to continuing to work with stakeholders to improve the ENERGY STAR Version 2.0 Water Heaters specification. Please direct any specific questions to Abigail Daken at EPA, [daken.abigail@epa.gov](mailto:daken.abigail@epa.gov) or 202-343-9375 and Craig Haglund, D&R International, at [chaglund@drintl.com](mailto:chaglund@drintl.com) or 301-588-9387. Thank you for taking the time to review this draft specification. I look forward to working with you over the next few months.

Sincerely,



Abigail Daken  
ENERGY STAR Water Heater Program Manager  
U.S. Environmental Protection Agency