Water Heater Version 2.0 Spec - Stakeholder Comments on Final Draft		
Topic	**Comment**	**EPA Responses**
General		
Effective Date	Since these criteria will be applicable to the Light Duty EPACT covered gas water heater category for the first time, the effective date be immediate, as is generally the case (as we understand it) for first-time coverage of products in the ENERGY STAR program.	Manufacturers may elect to have their Certification Body (CB) certify their eligible products to the Version 2.0 requirements as soon as the specification is finalized.
Definitions		
Solar	To avoid forcing manufacturers and certification bodies to use "proprietary" guideline, change section 1.(A).(c) to read as "c. Solar water heaters must include a collector and storage tank, and must use the sun's thermal energy to heat water. Solar type units eligible for the ENERGY STAR Water Heaters Program must be certified with the applicable American National Institute Standards for Solar water heaters, if any, or according to SRCC OG-300."	It is EPA's intention to revise the specification soon and will take into account this comment and consider any new test methods available for solar water heaters. This will also provide time for DOE and EPA to review and validate any new available test methods. To our knowledge, OG-300 is the only industry-accepted standard by which energy consumption can be quantified and compared on a level playing field.
	The definition of Solar Water Heater should be modified to distinguish residential products from commercial products. As defined it appears that any solar water heater would be covered by this program regardless of its intended application.	The scope of the specification includes water heaters intended for residential applications. Also, the SEF metric and the SRCC OG-300 test standard apply to residential solar water heaters only, thereby eliminating the possibility of a commercial solar water heater being able to qualify.
Gas Storage	Modify gas storage definition as "gas storage water heaters with a nominal input of 75,000 British thermal units (Btu) per hour or less and having a rated storage capacity of not less than 20 gallons nor more than 100 gallons; electric heat pump type units with a maximum current rating of 24 amperes at an input voltage of 250 volts or less, and, if the tank is supplied, having a manufacturer's rated storage capacity of 120 gallons or less."	Thank you for the comments. The definition will be updated accordingly.
General	Before the EPA considers the addition of any new product category into the ENERGY STAR® Residential Water Heater Program that the new product category is appropriately approved and listed in the DOE Residential Product Classifications.	Thank you for the comments. According to the scope of the specification, EPA has included products that are intended for residential applications though some fall outside the NAECA scope. This allows consumers to compare products which are alike in their consumer applications.
Scope		
General	It is technically possible to manufacture a gas storage water heater that meets the ENERGY STAR® specifications for both Residential and Commercial gas storage water heaters as currently proposed by the EPA. The scope should be revised to not preclude this option if a manufacturer chooses to develop a model that satisfies the criteria of both ENERGY STAR® programs.	EPA recognizes that very similar products could meet both the residential and commercial specifications - however, we would expect the customer relationship to be slightly different in the two cases. For instance, the warranty requirements are different. In addition, the thermostat may be different. To limit purchaser confusion, EPA simply expects manufacturers to use two different model numbers, one for residential application and one for commercial application.
	EPA should consider including certain types of residential water heaters such as electric storage, electric tankless and oil fired storage in this Energy Star program.	EPA is willing to consider including oil fired water heaters in the next revision of the specification and urges stakeholders to share any product performance or savings data with EPA.

Electric Tankless	POU electric tankless water heaters are highly energy efficient and provide a significant savings for consumers in both energy and water; specifically for those U.S. consumers with no access to natural gas. For numerous consumers considering new construction or add-ons to existing homes, the exclusion of POU units from the Energy Star program will deny them another energy- and water-saving option. We urge EPA to include it in the specification.	The specification continues to cover complete water heating systems that will save energy in the majority of water heater purchases – which are like for like replacements. Though POU products will not be added in version 2.0, EPA recognizes that in certain circumstances, these devices can save water and energy resources. Such information will be posted to the ENERGY STAR website to educate consumers on the situational benefits of this product category.
Test Requirements	The two references to “basic model group” should be changed to “basic model”, to be consistent with the definition given on line 76.	Thank you for the comments. The changes are included in the final specification.
Gas Storage		
Qualification Criteria	By combining these efficiency categories, it sends a confusing message to Manufacturers, the Industry and Consumers since the new minimum efficiency standard will exceed an ENERGY STAR® threshold in 2015 when NAECA III becomes effective.	Combining the condensing and storage categories is in line with EPA's ultimate goal of a technology neutral specification. EPA believes that this change will allow more gas condensing units to earn ENERGY STAR qualification. Utilities may choose to retain different incentives on a product-specific basis.
Electric		
Qualification Criteria	Include a discussion box in the draft to provide some information about how ENEGRY STAR plans to utilize compressor cut off temperature data. Hope the Agency sees this new metric as a way to help steer consumers to select appropriate product (those products that can continue to operate in heat pump mode at lower temperatures) for some of the more challenging install locations common to our region.	EPA intends to develop educational guidance for consumers on its website about the significance of compressor cut off temperature and its impact on the product performance in various climates. EPA looks forward to working with the stakeholders in developing this information.
Solar		
Qualification Criteria	Solar water heaters should have consistent backup energy efficiency requirements with storage type water heaters, electric and gas. In the case of a solar system malfunction, the performance of a solar water heater will be solely associated with the backup system. In order to maintain field performance comparable to the criteria for storage type systems (Sections 3A and 3B), Section 3C should be modified to include storage type EF and First Hour Rating performance criteria consistent with Sections 3A and 3B for electric and gas backup up systems, respectively.	Solar water heaters rely on different mechanisms for efficiency. EPA has not seen compelling information about solar water heater malfunctions, and so will not add requirements for the back up system to Version 2.0 of the specification.