



NRDC Comments on the ENERGY STAR Product Specification for Residential Water Heaters, Version 2.0: Draft 2

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On behalf of the Natural Resources Defense Council (NRDC) and its more than 1.3 million members and e-activists we respectfully submit our comments on the ENERGY STAR Product Specification for Residential Water Heaters, Version 2.0: Draft 3. NRDC offers the following comments on the specification.

NRDC submitted comments on the Version 2.0: Draft 3 specification urging EPA to allow all small water heaters designed to provide potable hot water to homes to qualify regardless of whether their input rate is less than or greater than 75,000 BTU/h. While EPA has modified the proposal to include hybrid type units with inputs above 75,000 BTU/h, the proposal appears to limit the size of these units to 50 gallons (limits to one gallon per 4,000 Btu/h of input with a maximum of 200,000 Btu/h of input). NRDC disagrees with this size limitation and urges EPA to include all EPACK-covered residential water heaters in the ENERGY STAR program, including larger storage units designed for residential use that use over 75,000 BTU/h. The Section 25C tax credit includes these units and does not include a size limitation. Products in this scope represent many of the most efficient residentially-intended and marketed products.

Additionally, NRDC believes the proposed thermal efficiency for units above 75,000 BTU/h is too low. As proposed in our previous comments, we suggest a thermal efficiency of 90 percent to harmonize with the Section 25C level and to encourage manufacturers to market their existing condensing products rather than worsening their performance to allow lower costs.

We appreciate the opportunity to submit these comments and urge EPA to include these larger-capacity water heaters within the scope of coverage.