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Beyond Efficiency
DWIGHT GREGORY ARCHITECTURE
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HIGH PLAINS ARCHITECTS
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Industry Professional Comments on ENERGY STAR Requirements for Residential Water Heaters
Version 5 Draft 1

On behalf of the undersigned industry professionals, who represent leading architects, engineering, and construction firms, we write to express our strong support for the key role ENERGY STAR appliances play in the design of energy efficient and cost-effective projects.

In residential buildings water heating is one of the largest opportunities to reduce energy use and GHG emissions. https://appliance-standards.org/sites/default/files/Powerful_Priority_Report.pdf We support improving the water heating specification as proposed in version 5 draft 1, with a few improvements noted below.

ENERGY STAR is a voluntary standard reserved for high performance appliances that minimize energy use, reduce GHG emissions, and minimize unhealthy air pollution. It should therefore be reserved for appliances that achieve that high bar with both gas and electric appliances held to the same high standard. We do not support a lower Uniform Energy Factor (UEF) for tankless gas water heaters than for other appliances. Understanding methane's outsized contribution to climate change, and the puff of methane that tankless heaters release when they fire, makes it all the more important that they not be given a lower standard. We support a robust and uniform standard with a UEF of 1.3 or higher for all appliances.

The inclusion of digital connectivity requirements is critical to allow water heaters to be controlled to operate in off-peak hours, reducing both energy cost and impacts to the electric grid. In addition, there is the opportunity to shift the market for electric resistance water heaters to heat pump appliances with significantly lower electrical demand to free up grid capacity for electrification of vehicles and other loads.

These recommendations will result in real cost savings for customers and reduce both GHG emissions and other air pollutants. We respectfully request that you consider these revisions.

Sincerely,

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