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**Bradford White Corporation Comments to Energy Data Collection-
Phase 3**

Additional submitted attachment is included below.



April 13, 2026

Commissioner Andrew McAllister
California Energy Commission
715 P Street
Sacramento, California 95814

Submitted Electronically to: [California Energy Commission : e-comment : Submit Comment](#)

Re: Docket # 25-BSTD-03 Codes and Standards Enhancement (CASE) Initiative: Nonresidential HPWH Ventilation Clean-Up

Dear Commissioner McAllister,

On behalf of Bradford White Corporation (BWC), we would like to thank you for the opportunity to comment on the CASE Initiative: Nonresidential HPWH Ventilation Clean-Up.

BWC is an American-owned, full-line manufacturer of residential, commercial, and industrial products for water heating, space heating, combination heating, and water storage. We are proud to have made our own significant investments in products that provide substantial energy conservation and environmental benefits, such as ENERGY STAR®-certified electric heat pump water heaters (HPWH). As a testament to our efforts, we have been recognized as an ENERGY STAR Partner of the Year for five consecutive years. In California, a significant number of individuals, families, and job providers rely on our products for their hot water and space heating needs

General Comments

BWC appreciates the intent of the CASE initiative to help improve product efficiency, performance, and customer satisfaction of HPWHs. While the proposed measure update intends to simplify the nonresidential unitary HPWH ventilation compliance pathways implemented in the 2025 Energy Code, BWC maintains that the code should not be overly prescriptive, and instead refer to manufacturer's installation instructions in all cases. The current 2025 allows ventilation strategies including:

- Venting approved by the manufacturer,
- Installing the HPWH in a large unvented room of prescribed minimum size,
- Installing in a closet with minimum prescribed ventilation area to adjacent spaces via louvers or a duct, and;
- Directly ducting the unit to the outdoors or to an adjacent space.

While we do not disagree that improperly ventilated HPWHs may lead to efficiency loss, performance degradation and the possibility of creating adverse ambient conditions (e.g. surface condensation); specifying installation standards, especially if inconsistent with manufacturer installation instructions, may create further

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challenges with equipment as well as limit creative solutions.

In January 2026, water heater manufacturers and members of the Air-Conditioning, Heating, and Refrigeration Institute (AHRI) along with several third-party stakeholders, convened a working group to specifically address the ventilation challenges outlined in this code change proposal. The outcome of the working group is to develop an industry guideline for how water heater manufacturers include ventilation installation instructions in their product installation manuals.

To address the specific questions asked by the CASE team, our responses are as follows:

- 1) Is the updated code language clear that both intake and exhaust ducts are needed when ventilating a HPWH to the outdoors?

The updated code language is clear; however we encourage the CASE Team to simply leave the language to read similar to “If a HPWH is installed where ducting to the outside is necessary, an intake duct to the outside must also be provided. Ducting should be installed per HPWH manufacturer installation instructions” The code should not specify any prescriptive conditions for ducting including but not limited to:

- A definition or volume size of a “small room”
- Duct size
- Duct length, or equivalent length including fittings
- Duct material or insulation R-value
- Minimum ambient conditions
- Minimum air volume

As stated above, manufacturers have convened a working group, with the purpose of addressing installation challenges surrounding ventilation. The AHRI guideline will serve as a standard for manufacturers to write installation instructions into their product manuals.

- 2) Are the estimates for the percentage of buildings that can implement dual ventilation ducts representative?

Where proper installation and ventilation of a HPWH are concerned, especially in new construction, manufacturer installation instructions should be followed regardless of the building type. HPWH’s are designed to meet a certain demand for hot water under standardized operating conditions. If a building is designed such that a HPWH cannot be installed per manufacturer installation instructions, then additional measures must be considered to ensure adequate hot water is supplied. In cases where ventilation challenges pose a health or safety risk, exceptions should be allowed for alternative technologies to be used.

In summary, and reflected in our comments above, BWC believes that the 2028 code language surrounding nonresidential HPWH ventilation should not prescriptively require any design features beyond requiring an intake and exhaust duct to be used if venting outside of the pressure boundary. Nothing in the ventilation clean-up language should be interpreted to require installation practices, testing, or product design characteristics beyond those specified in the HPWH manufacturer's published installation instructions.

BWC appreciates the opportunity to comment, and we look forward to continuing our collaboration with the CASE Team and California Energy Commission on this important code development.

Respectfully Submitted,

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Bradford White Corporation

Tom Gervais
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