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HPWH Installation Provisions for Health and Safety-Part 3

The purpose of this comment is to provide context for the code change proposal I submitted.
1. The evidence shows that improper installation of air-source HPWHs creates risks of moisture damage and mold in buildings throughout the country. Mitigating these risks is within the purview of the plumbing and mechanical codes.
2. I think it is important for these model codes to provide guard rails that can be followed whenever a permit is pulled for installing water heaters, including HPWH.
3. I also think it is important that the installation manuals have these same guard rails. Codes refer to the manuals, which is fine, Manuals are available for the installer whether or not a permit has been pulled.
4. The code development process has its own time schedule. In addition to the Energy Commission, the national model plumbing and mechanical codes begin the 2030 code development proceedings in early 2027. Assuming that electric water heaters greater than 35 gallons will be required to be HPWH starting in May 2029, it is critical that the codes that come out in 2030 have the necessary guard rails in place,
5. It is also critical that the installation manuals have these same guard rails in place by then. Sooner would be better. I am a member of the AHRI Guideline U committee which is working hard to provide clear recommendations to manufacturers. It is my intent to continue working within this collaborative industry framework.
6. Personally, I think that the health and safety provisions for the installation of HPWH belong in the plumbing and mechanical codes, not in the energy codes. If the Energy Commission decides to adopt provisions for HPWH during this cycle, I would recommend that they agree to rescind them in the 2031 update to T-24 if the 2030 UMC and UPC (the basis for the CMC and CPC) adopt similar provisions that protect public health and safety. There are some provisions that belong in the energy codes, and these should be separated out from those that are about health and safety.

Thank you for considering my comments. Looking forward to discussing the merits of the various proposals in the coming weeks.

Sincerely, Gary Klein