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California Energy Commission

DOCKETED

14-BSTD-01

TN 72570

AUG 07 2014

August 7, 2014

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 14-BSTD-01
1516 Ninth Street
Sacramento, CA 95814-5512

Subject: Docket 14-BSTD-01 Title-24 Residential Instantaneous Water Heater Workshop

Rheem is headquartered in Atlanta, Georgia and operates multiple facilities for the manufacture and support of the most comprehensive line in the U.S. of residential and commercial water heaters including storage, instantaneous and solar with nationwide distribution through retail, wholesale and utility channels. Rheem submits the following comments in response to the Commission's July 23, 2014 CEC Workshop for proposed 2016-2017 Title 24 Residential Water Heater specification:

- Rheem supports the proposed 0.82 Energy Factor (EF) minimum requirement for gas instantaneous water heaters. This will match the Federal minimum standard which goes into effect April 16, 2015.
- Rheem opposes the Commission's proposal that prohibits installation of minimum efficiency gas storage water heaters that otherwise meet the Federal standard. Rheem believes this proposal is unlawful as it preempts Federal Regulation.
- The Title 24 standard should be technology neutral and allow installation of a federally compliant minimum efficiency IWH, electric or gas storage water heater as prescriptive path options. The proposed requirement to add solar heating to a minimum efficiency gas storage heater should only be a performance path option.
- Most importantly, the Title 24 standard should permit the use of a variety of energy efficient performance path options, such as the use of any of the following: a heat pump water heater, a gas-fired condensing water heater or a combination appliance technology water heater.

Additionally, Rheem believes the Commission may have proposed that minimum efficiency gas storage water heaters be allowed only when adding a solar water heating system based solely on the EF rating. There are factors which effect water heater performance associated with current EF ratings which should be considered by the Commission. Efficiency comparisons between gas-storage and gas IWH cannot be based solely on EF due to inherent effects of stand-by loss (SBL) and First Hour Rating



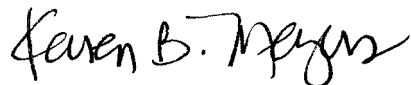
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(FHR). Typically, gas IWH EF ratings will be higher than gas storage models due to lower SBL and higher FHR. It is assumed that CEC will adjust the proposed requirements to include “residential duty commercial water heaters” and reflect the ratings established utilizing the new DOE uniform descriptor method of test.

Thank you for the opportunity to comment. Rheem holds a significant presence in the U.S. water heating industry and maintains a progressive path towards the advancement of water heating technology, and we remain committed to serving as an active participant in the California water heating market.

Sincerely,

RHEEM MANUFACTURING COMPANY

A handwritten signature in black ink that reads "Karen B. Meyers". The signature is written in a cursive, flowing style.

Karen B Meyers
Corporate Director, Government Relations