

DOCKETED

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Support for leveraging ENERGY STAR Certification for Heat Pump Water Heaters in Build

Additional submitted attachment is included below.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
AIR AND RADIATION

June 26, 2020

The California Energy Commission and California Public Utility Commission
C/O California Energy Commission
Docket Unit, MS-4 Docket No. 20-DECARB-01
1516 Ninth Street Sacramento, CA 95814-5512

Dear honorable Commissioners and interested parties of CEC docket 20-DECARB-01:

RE: Leveraging ENERGY STAR for Heat Pump Water Heaters (HPWH) and Connected Heat Pump Water Heaters in California initiatives including the following:

- Building Initiative for Low Emissions Development (BUILD) program –all electric new homes (DOCKET: # 20-DECARB-01)
- Self-Generation Incentive Program (SGIP), Heat Pump Water Heater set aside

Thank you for the opportunity to provide comment on the subject initiatives. As California continues to pursue its ambitious plans to advance residential heat pump water heater technologies through the referenced dockets and initiatives, we are writing to express support for consideration of ENERGY STAR certification as potential criteria in these initiatives.

While this letter focuses on heat pump water heaters, we also wanted to express our support for inclusion of ENERGY STAR certified heat pump clothes dryers and solar water heaters in the BUILD program.

We believe leveraging ENERGY STAR-certification and using the ENERGY STAR label to market related opportunities to suppliers and consumers is particularly valuable when introducing new technology, such as heat pump water heaters, to the marketplace.

- ENERGY STAR® is widely recognized as the simple choice for energy efficiency. Ninety-one percent of households recognize the blue label according to a [recent report](#) (PDF, 2.3 MB). Behind each blue label is a product that is independently certified to deliver the quality, performance, and savings that consumers have come to expect.
- Most U.S. households also recognize and understand the intent of the ENERGY STAR label. Each year a substantial portion of U.S. households knowingly purchase at least one ENERGY STAR certified product and report being influenced by the label to do so.
- Given the substantial energy savings with this product category, EPA is making a significant investment in educating consumers about the benefits of heat pump water heaters and has

developed several popular online tools including a Water Heater Replacement Guide, Heat Pump Water Heater Installer Finder, and a product finder.

The initiatives reference potential efficiency levels for heat pump waters that are slightly different and/or more stringent than the current ENERGY STAR specification, and while our analysis indicates the current levels to be appropriate and cost effective for consumers, we understand that the market will continue to evolve as deliberation on these initiatives continues. As such, if California ends up wishing to focus one or more initiatives on a subset of ENERGY STAR certified Heat Pump Water Heaters, we think it is beneficial to focus on UEF as the core efficiency metric rather than a climate specific metric.

Importantly, UEF is an easily sortable feature in the ENERGY STAR qualifying product lists and API datasets. APIs enable program partners to seamlessly provide customers and trade allies up-to-date lists of certified products that directly match program requirements, while maintaining the important connection to the ENERGY STAR brand.

In addition, ENERGY STAR has issued draft criteria defining optional connected criteria for ENERGY STAR certified heat pump water heaters, which includes CTA-2045A as one of two allowable communications standards. ENERGY STAR specification development has brought together many different stakeholders in a consensus development process, and as such, it is our expectation that the ENERGY STAR qualified product list will become the central repository for products tested to deliver load shifting capability (including products that meet all other specifications currently active in the market).

EPA supports California referencing ENERGY STAR-certified Connected Heat Pump Water Heaters in relevant initiatives and is committed to making the communication standard a sortable feature in our qualifying product lists and available API datasets. Requiring ENERGY STAR certification will enable California to leverage the well-established infrastructure of testing and 3rd party certification for ENERGY STAR products.

Several manufacturers including AO Smith, Rheem, and Bradford White have been active in connected criteria development, and are therefore likely to be considering certifying products with connected functionality once the specification is final.

Given California's substantial investment in heat pump technology over the coming years, California is in a unique position to influence the marketplace, and we believe leveraging ENERGY STAR certification to the maximum extent practical will help ensure not only that California meets its ambitious energy efficiency and decarbonization goals, but also contributes more broadly to advancing the national market for energy efficient, ENERGY STAR certified Heat Pump Water Heaters.

We look forward to continuing our work together to transform the market for efficient products and practices and protect the environment for future generations. If you have any questions on the above recommendations, please do not hesitate to reach out and contact Maureen McNamara at mcnamara.maureen@epa.gov.

Sincerely,



Ann Bailey,
Chief, ENERGY STAR Labeled Products
Climate Protection Partnerships Division