

**DOCKETED**

<b>Docket Number:</b>	24-BSTD-01
<b>Project Title:</b>	2025 Energy Code Rulemaking
<b>TN #:</b>	258007
<b>Document Title:</b>	NEEA comments - 2025 CA Energy Code Rulemaking - AWHHS
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Kevin Rose
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	7/25/2024 9:40:22 PM
<b>Docketed Date:</b>	7/26/2024

*Comment Received From: Kevin Rose*  
*Submitted On: 7/25/2024*  
*Docket Number: 24-BSTD-01*

**NEEA comments - 2025 CA Energy Code Rulemaking - AWHs**

*Additional submitted attachment is included below.*

July 25, 2024  
Submitted Electronically



California Energy Commission  
715 P Street  
Sacramento, CA 95814

Re: 2025 Energy Code Rulemaking – Advanced Water Heating Specification (AWHS)  
Docket Number: 24-BSTD-01

Dear Commissioners and CEC Staff,

The Northwest Energy Efficiency Alliance (NEEA) submits the following comments to address industry stakeholder responses to the [2025 Energy Code 45-day Language](#) and subsequent [15-day Language](#) regarding NEEA's Advanced Water Heating Specification (AWHS).

NEEA is a non-profit organization working to encourage the development and adoption of energy-efficient products, practices, and services. Funded by regional utilities, NEEA is a collaboration of 140 utilities and efficiency organizations working together to advance energy efficiency in the Northwest on behalf of more than 13 million consumers. This unique partnership has helped make the Northwest region a national leader in energy efficiency. NEEA's AWHS provides guidance to manufacturers and market actors interested in developing residential, commercial, multifamily, and industrial water heating products capable of providing high levels of consumer satisfaction and energy performance in a range of climates.

## Comments

The proposed 2025 Energy Code cites version 8.0 of the AWHS. However, [AWHS v8.1](#) went into effect earlier this month. Industry stakeholders submitted comments expressing concerns about Title 24 not aligning with the most current version of the AWHS.

**The purpose of our comment is to clarify that any product certified to AWHS v8.0 would also qualify for AWHS v8.1.** Please contact us if you need any further information on this topic.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin Rose".

Kevin Rose  
Sr. Engineer, Codes & Standards  
Northwest Energy Efficiency Alliance  
700 NE Multnomah Street, Suite 1300, Portland, Oregon 97232  
503.688.5400  
[krose@neea.org](mailto:krose@neea.org)