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NEEA comments - AWHs 2

Additional submitted attachment is included below.

September 5, 2024
Submitted Electronically



California Energy Commission
715 P Street
Sacramento, CA 95814

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

Dear Commissioners and CEC Staff,

The Northwest Energy Efficiency Alliance (NEEA) submits the following comments regarding NEEA's Advanced Water Heating Specification (AWHS) in response to the [2025 Energy Code Notice of 15-day Comment Period \(August 2024\)](#).

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 latest 15-day language resolves previous stakeholder concerns about Title 24 not aligning with the most current version of the AWHS. NEEA offers the following comments in response to other industry stakeholder comments requesting reduction or removal of the AWHS reference:

1. The only notable change between AWHS version 8.0 and 8.1 is that load flexibility is no longer a self-certification process. It now requires a third-party certification – either EcoPort CTA-2045 or AHRI 1430 listing.
2. Compliance to AWHS 8.1 is voluntary.

Please contact us with any further questions. Sincerely,

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

Kevin Rose
Sr. Engineer, Codes & Standards
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