

DOCKETED

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Comment Received From: Bradford White Corporation

Submitted On: 2/28/2018

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On Proposed Changes to the California Code of Regulations, Title 24, Part 6

Additional submitted attachment is included below.



February 28, 2018

California Energy Commission
Attention: Docket No. 17-BSTD-02
Dockets Office
1516 Ninth Street, MS-4
Sacramento, CA 95814

Re: Proposed Changes to the Building Energy Efficiency Standards in the California Code of Regulations, Title 24, Part 6

To Whom It May Concern:

On behalf of Bradford White Corporation (BWC), thank you for the opportunity to comment on the proposed changes to the Building Energy Efficiency Standards, Title 24, Part 6. Our comments are in reference to changes for water heating.

BWC supports California Energy Commission (CEC) in altering Title 24 to be both fuel and technology neutral while promoting energy efficiency and retaining consumer choice. For this reason, we do not support the removal of the option of a gas storage water heater with a capacity less than or equal to 55 gallons. There are high efficiency products that fall into this category that provide the same utility as the other products being biased and still contribute to the overall goal of saving energy. We also believe this proposal infringes on federal preemption. Additionally, we feel it is also important to provide consumers with less expensive options that still result in forward progress, especially since the cost of living in California is significant and continues to climb.

We support the inclusion of electric heat pump water heaters as an option. BWC sees these as an underutilized product in California, especially considering they have the added feature of being able to tie into an electric load management program.

BWC strongly recommends CEC reconsider applying additional requirements for one technology versus another. For instance, insulated piping and drain water heat recovery are required for storage type water heaters but not tankless water heaters. This results, at least indirectly, in CEC

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picking technology winners and losers. For example, if the same amount of hot water goes down the drain regardless of the type of water heater used, why would the hot water generated and used by a tankless water heater be less important than the hot water generated by other water heating technologies, such as storage water heaters?

Furthermore, we've received feedback that additional pipe insulation is not always installed correctly the first time as confirmed by an auditor. This requires both the installer and auditor to visit the site a second time. This drives up the installation cost and dissuades individuals from dealing with the perceived headache of installing pipe insulation altogether, which prevents them from installing a storage water heater.

Finally, we find it concerning that the code currently favors tankless technology when these products do not discourage the use of excessive water when the state is in a drought and supports the purchase of products that are currently and exclusively manufactured overseas. Given the behavior difference for tankless water heaters leading to the use of more water, it further begs the question, "why isn't drain water heat recovery required for tankless water heaters as well?" We welcome discussions on how we can modify the code to achieve CEC's goals while maintaining consumer choice and energy efficiency.

Bradford White Corporation thanks you for this opportunity to comment on the proposed changes to the Building Energy Efficiency Standards, Title 24, Part 6.

Respectfully Submitted,

Bradford White Corporation

Eric Truskoski
Director of Government and Regulatory Affairs

Cc: B. Carnevale; M. Taylor; B. Hill; L. Prader; C. Sanborn; B. Wolfer;

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