

DOCKETED

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March 23rd, 2020



Commissioner J. Andrew McAllister, Ph.D.
California Energy Commission^[L]_[SEP]
Dockets Office, MS-4^[L]_[SEP]
Re: Docket No. 19-BSTD-09
1516 Ninth Street
Sacramento, CA 95814

RE: Northwest Energy Efficiency Alliance (NEEA), Comments on Joint Appendix JA13 Qualification Requirements for Heat Pump Water Heater Demand Management Systems

Dear Commissioner, McCallister:

NEEA appreciates the opportunity to provide comments on the California Energy Commission's ("CEC" or "Commission") Joint Appendix JA13 Qualification Requirements for Heat Pump Water Heater Demand Management Systems ("JA13"). Heat pump water heaters ("HPWHs") play an essential role important to California policy priorities: helping to manage the integration of increasing amounts of renewable energy as HPWHs shift load and serve as thermal energy storage devices.

NEEA released the updated voluntary specification the Advanced Water heating Specification (AWHS) at the end of 2019. The new version is [version 7.0](#). It goes into effect July 1st, 2020. It would be a shame that California wouldn't use the current version of the NEEA specification which also includes the 120 volt product requirement.

In the updated specifications the following key changes were made:

- Renaming the Northern Climate Uniform Energy Factor (UEFnc) to Cool Climate Efficiency (CCE)
- Demand response enabled is required in Tier 3 and above (CTA 2045)
- Optional warm climate test (95°F ambient) and calculation method added (Added because of the California market requested)
- Northern climate delivery rating replaced in favor of a more informative, high-volume use test
- Airflow measurement test made optional

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- Plug-In (120Volt) HPWH Specification added as an appendix (Appendix A) (Added because of the California market requested)
- All existing qualified products that currently meet tier 3 will remain on the qualified products list

The qualified product list will be kept up to date with the new version starting July 1st, 2020.

Respectfully,

Geoff Wickes,

Senior Product Manager, Emerging Technology – Water Heating

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