

DOCKETED

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Rheem Comments on Joint Appendix JA13 Qualification Requirements

Additional submitted attachment is included below.



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March 26, 2020

Commissioner J. Andrew McAllister
California Energy Commission
Docket Office, MS-4
Re: Docket No. 19-BSTD-09
1516 Ninth St
Sacramento, CA 95814

Re: Rheem Comments on Joint Appendix JA13 Qualification Requirements for Heat Pump Water Heater Demand Management Systems

Dear Commissioner McAllister,

Rheem Manufacturing Company (Rheem) appreciates the opportunity to provide these comments on the California Energy Commission's ("CEC" or "Commission") Joint Appendix JA13 Qualification Requirements for Heat Pump Water Heater Demand Management Systems. Given the unique performance capabilities of heat pump water heaters not only to heat water efficiently, but also to store and shift energy, they can play an important role to attain California policy priorities. Namely to reduce carbon emissions and support integration of renewable energy.

Rheem is an industry leader in total heating, cooling, refrigeration and water heating solutions and one of the few global brands with product offerings covering residential and commercial heating, cooling, conventional and hybrid storage water heaters, tankless water heaters, solar water heating systems, pool and spa heaters, commercial boilers, residential hydronic and geothermal systems, commercial refrigeration products, indoor air quality accessories, and replacement parts for all categories. Rheem is headquartered in Atlanta, Georgia, and has U.S. based manufacturing facilities in Alabama, Arkansas, California, Connecticut, and North Carolina. The company also operates distribution facilities throughout the US, Canada and many other countries around the world.

Rheem, in collaboration with industry stakeholders over the past several months helped develop the initial specification, Appendix JA13 for Heat Pump Water Heater Demand Management Systems, which was submitted to CEC August 9, 2019. More recently, Rheem participated to update and add two important improvements to this specification which was submitted to the docket by Natural Resources Defense Council ("NRDC") on March 20, 2020. Rheem supports this latest version of Appendix JA13 and strongly encourages the Commission to adopt this with one modification, as detailed below.



INTEGRATED HOME COMFORT



The Safety Requirements section now includes a provision for compliance for water heaters with integrated temperature-limiting device as alternate to requiring the installation of a thermostatic mixing valve conforming to ASSE 1017 on the hot water supply line. Rheem recommends edits to the NRDC language and recent A.O. Smith proposal to ensure water heaters with integrated devices comply with the safety requirements instead of the valve standard itself and limit maximum hot water delivery temperature to 120 °F. Rheem recommends the Commission adopt the following improved language to the safety requirements in Appendix JA13

A thermostatic mixing valve conforming to ASSE 1017 shall be installed on the hot water supply line following all manufacturer installation instructions or a water heater that conforms to UL 60730-1, ASSE 1082, or ASSE 1084 and limits delivered water temperature to a maximum of 120 °F.

The Minimum Performance Requirements section now includes reference to version 6.0 or 7.0 of the Northwest Energy Efficiency Alliance (NEEA) Advanced Water Heater Specification. Rheem supports reference to both versions of the specification recognizing the need for flexibility and adequate time to fully transition product designs to version 7. Both versions are identical in terms of northern climate uniform energy factor values, however version 7.0 adds a requirement to comply with CTA-2045A, along with two new sections; Appendix A for Plug-In Heat Pump Water Heater Specification and Appendix G for Demand Response. Rheem recommends, the Commission adopt this language allowing compliance with either version 6.0 or 7.0.

Again, Rheem urges the Commission to quickly adopt the JA13 specification with noted improvements as this will provide clarity for requirements and certainly for new product introductions. Rheem appreciates the opportunity to comment and looks forward to the Commission's response.

Sincerely,

RHEEM MANUFACTURING COMPANY

A handwritten signature in black ink that reads "Karen B. Meyers".

Karen Meyers
Vice President, Government Affairs

CC: Joe Boros

