

DOCKETED

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Bradford White Corporation Comments to 2025 Express Terms

Additional submitted attachment is included below.



November 16, 2023

California Energy Commission

Re: Docket #: 22-BSTD-01

Project Title: 2025 Energy Code Pre-Rulemaking

1516 Ninth Street

Sacramento, CA 95814

[Electronically Submitted to: title24@energy.ca.gov]

Re: Bradford White Corporation Comments to 2025 Express Terms

Dear California Energy Commission:

On behalf of Bradford White Corporation (BWC), we would like to thank you for the opportunity to comment on the California Energy Commission (CEC) 2025 Energy Code Pre-Rulemaking, proposed Express Terms.

BWC is an American-owned, full-line manufacturer of residential, commercial, and industrial products for water heating, space heating, combination heating, and water storage. In California, a significant number of individuals, families, and job providers rely on our products for their hot water and space heating needs.

Upon reviewing the Express Terms, we would like to provide the following suggestions to help clarify water heating requirements and definitions:

2025 California Plumbing Code, Chapter 5 Water Heaters, Table 501.1(2) First Hour Rating

The CEC updated the reference in Joint Appendix 13 (JA 13) Table 501.1(2) First Hour Ratings to reflect the 2025 California Plumbing Code. The updated reference is contained in JA 13, which is a voluntary standard for heat pump water heaters (HPWH) to be used in demand side management programs. As the first hour rating requirements in Chapter 5, Table 501.1(2) in 2025 California Plumbing Code are applicable to all service water-heating systems and equipment, we recommend CEC update Section 110.3 Mandatory Requirements for Service Water-Heating Systems and Equipment with those First Hour Rating (FHR) requirements. Doing so provides clarity all service water-heating systems and equipment shall comply with the first hour rating requirements of Chapter 5, Table 501.1(2) in the 2025 California Plumbing Code.

Water Heater Definitions

The Express Terms 'water heater' definitions include the following:

- "CONSUMER WATER HEATER, is a water heater that meets the definition of a consumer product under 10 CFR 430."

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There is not a definition for “COMMERCIAL WATER HEATER” in the Express Terms. Was it CEC’s intention that any water heater not meeting the CONSUMER WATER HEATER definition is a COMMERCIAL WATER HEATER?

In order to help users understand the difference between a CONSUMER WATER HEATER and a COMMERCIAL WATER HEATER, we recommend including a definition for a COMMERCIAL WATER HEATER, as follows:

- COMMERCIAL WATER HEATER, is a water heater that meets the definition of a commercial product under 10 CFR 431.

Additionally, we would encourage the CEC to include the definition text from 10 CFR 430 and 431 as well as citing the reference.

Heat Pump Water Heater Definitions

The CEC includes definitions for SPLIT-REFRIGERANT HEAT PUMP WATER HEATER and SPLIT-HYDRONIC HEAT PUMP WATER HEATER. Neither of these terms exists in the body of the code.

- Did the CEC include these terms to describe a HPWH system that is not an INTEGRATED HEAT PUMP WATER HEATER?

As these terms of art are not commonly utilized, especially SPLIT-HYDRONIC HEAT PUMP WATER HEATER, if the CEC requires a definition for a HPWH system that is not an INTEGRATED HEAT PUMP WATER HEATER, we recommend CEC utilize the 10 CFR 430 definition of Split-system heat pump water heater, as follows:

- SPLIT-SYSTEM HEAT PUMP WATER HEATER, means a heat pump-type water heater in which at least the compressor, which may be installed outdoors, is separate from the storage tank.

BWC strongly urges the CEC to consider our questions and comments, which seek to clarify water heater FHR and definitions. We thank the CEC for the opportunity to provide feedback on the proposed Express Terms. Please let me know if you have any questions or would like to schedule a meeting to discuss our comments further.

Respectfully Submitted,

Bradford White Corporation

Michael Corbett
State Government Affairs & Product Specialist

Cc: E. Truskoski; T. Gervais; B. Ahee

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