

DOCKETED

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BWC Comments to Revised 15 Day Language

Additional submitted attachment is included below.



September 6, 2024

California Energy Commission
Building Energy Efficiency Standards - Title 24
715 P Street
Sacramento, California 95814

[Submitted electronically via: [California Energy Commission : e-comment : Submit Comment](#)]

Re: 2025 Title 24 Part 6, revised 15-day language

To Whom It May Concern:

On behalf of Bradford White Corporation (BWC), we would like to thank you for the opportunity to comment on California Energy Commission's (CEC) Title 24, Part 6 revised 15-day language.

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. We have compiled our comments to the CEC's revised 15-day language below.

Joint Appendix 13

BWC appreciates the CEC modifying the Joint Appendix 13 (JA-13) language to reference the most recent Northwest Energy Efficiency Alliance (NEEA) Advanced Water Heater Specification (AWHS) Version 8.1, with a listed effective date of July 15, 2024. At this time, BWC concurs with our industry partners at the Air-Conditioning, Heating, and Refrigeration Institute (AHRI) that JA-13 should only reference the efficiency requirements contained in AWHS Version 8.1 Section 2.4.2.1¹. Sections of AWHS that do not address equipment efficiency should not be included in JA-13 or in other sections of Title 24, Part 6. Along with the references to AWHS Version 8.1 contained in JA-13, BWC encourages the CEC to review the remaining sections in the 2025 proposed code which refer to AWHS, to ensure that only the efficiency requirements are referenced.

BWC would also like to bring attention to the ENERGY STAR requirement contained in AWHS version 8.1, Section 2.4.1.2. As a prerequisite for a heat pump water heater (HPWH) to qualify under AWHS Version 8.1, a HPWH must meet a minimum efficiency as defined ENERGY STAR 5.0, Section 3A², as shown in the table below and be listed on the ENERGY STAR website:

¹ [Advanced-Water-Heating-Specification.pdf \(neea.org\)](#)

² [ENERGY STAR Version 5.0 Residential Water Heaters Specification and Partner Commitments](#)

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Table 1: Criteria for Certified Electric Water Heaters

Criteria		ENERGY STAR Requirements
Uniform Energy Factor	Integrated HPWH	UEF \geq 3.30
	Integrated HPWH, 120 Volt / 15 Amp Circuit	UEF \geq 2.20
	Split-system HPWH	UEF \geq 2.20
First-Hour Rating		FHR \geq 45 gallons per hour
Warranty		Warranty \geq 6 years on sealed system
Safety		UL 174 and UL 1995 or UL 60335-2-40
Lower Compressor Cut-Off Temperature (Reporting Requirement Only)		Report ambient temperature below which the compressor cuts off and electric resistance only operation begins
Upper Compressor Cut-Off Temperature (Optional Reporting Only)		Partners may report the ambient temperature above which the compressor cuts off and electric resistance only operation begins

For future code cycles, BWC encourages the CEC to consider using ENERGY STAR as the basis for HPWH efficiency requirements. As the CEC continues discovery and development of flexible demand appliance standards and how HPWHs interact with California's electrical grid, new requirements may emerge that are inconsistent with AWHs. Furthermore, ENERGY STAR references federally regulated test procedures and resulting efficiency metrics that manufacturers already adhere to and publish in product literature.

In closing, we would like to thank the CEC for the opportunity to comment on the revised 15-day language. 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

Tom Gervais
Senior Director, Regulatory Affairs

Cc: E. Truskoski; L. Prader; M. Corbett; B. Ahee; B. Wolfer

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