

Appliance Standards Awareness Project
American Council for an Energy-Efficient Economy
Northwest Energy Efficiency Alliance

August 9, 2021

Ms. Catherine Rivest
U.S. Department of Energy
Office of Energy Efficiency and Renewable Energy
Building Technologies Office, EE-5B
1000 Independence Avenue SW
Washington, DC 20585

RE: Docket Number EERE–2017–BT–STD–0021/RIN 1904–AD90: Notice of Proposed Determination for Energy Conservation Standards for Unfired Hot Water Storage Tanks

Dear Ms. Rivest:

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP), American Council for an Energy-Efficient Economy (ACEEE), and Northwest Energy Efficiency Alliance (NEEA) on the notice of proposed determination (NOPD) for energy conservation standards for unfired hot water storage tanks (UFHWSTs). 86 Fed. Reg. 30796 (June 10, 2021). We appreciate the opportunity to provide input to the Department.

We urge DOE to set aside this proposed determination and instead focus on developing a test procedure for standby loss for UFHWSTs. While there is a prescriptive design requirement for UFHWSTs, there is currently no test procedure or performance-based standard in place for these products. In the 2016 final rule for commercial water heating equipment test procedures, DOE stated that they would address the previously proposed standby loss test procedure for UFHWSTs in a separate rulemaking notice.¹ However, DOE has yet to advance the test procedure rulemaking for these products. Because of this, DOE is limited in this standards rulemaking to considering only an update to the existing prescriptive standard with no potential consideration of a performance-based standby loss standard.

The current standard only regulates the thermal resistance of the insulation material on the tank, and this requirement alone does not guarantee that all tank surfaces are sufficiently insulated. Significant energy savings may be possible by adopting a performance-based standard for standby losses. Performance-based standards would provide a better understanding of actual energy consumption and would likely encourage improved methods to reduce heat loss. We encourage DOE to complete a rulemaking for a performance-based test procedure in order to standardize standby losses in UFHWSTs prior to moving forward with a determination for these products.

¹ 81 Fed. Reg. 79277. November 10, 2016.

Thank you for considering these comments.

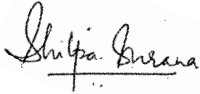
Sincerely,



Kanchan Swaroop
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Christopher Perry, PE
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