



2111 Wilson Boulevard Suite 500 Arlington VA 22201-3001 USA
Phone 703 524 8800 | Fax 703 562 1942
www.ahrinet.org

June 12, 2015

Ms. Brenda Edwards
U.S. Department of Energy
Building Technologies Office, Mailstop EE-5B
1000 Independence Avenue SW
Washington, DC 20585

Re: NOPR on Conversion Factor for Uniform Energy Factor Rating
Docket No. EERE-2015-BT-TP-0007

Dear Ms. Edwards:

On May 14, 2015 the Air-Conditioning, Heating, and Refrigeration Institute (AHRI) submitted comments on the notice of proposed rulemaking (NOPR) regarding a mathematical conversion factor to translate the current efficiency ratings for water heaters to the Uniform Energy Factor (UEF) and capacity ratings determined by the amended test method issued by DOE on July 11, 2014. Those comments included spreadsheets summarizing the results comparative energy factor (EF) and uniform energy factor (UEF) tests conducted either as part of AHRI's efficiency certification program or by our water heater manufacturer members. During the May 28, 2015 public meeting DOE staff requested us to provide some additional information regarding these tests including key characteristics of the units that were tested. On June 1, 2015 DOE staff provided us with the templates for submitting the requested information.

Accordingly, attached are the test results of the following categories of water heaters: Gas Storage; Gas Instantaneous; Electric Storage; and Gas Residential Duty Commercial Storage, transferred to the templates provided by DOE. In all but a very few cases we were able to add the information which DOE sought.

AHRI is continuing to develop information to address this NOPR which will be provided in additional comments. If you have any questions regarding this submission, please do not hesitate to contact me.

Respectfully Submitted,

Frank A. Stanonik
Chief Technical Advisor

Attachment